

EPA Registration File No. 89459-11
Vol 1.

Bryceland, Andrew

From: Iain Weatherston <iweatherston@cox.net>
Sent: Tuesday, June 16, 2015 10:24 AM
To: Bryceland, Andrew
Cc: Pfeifer, Chris; Hollis, Linda
Subject: Re: 89459-RR - Question on product name.

Andrew:

Subsequent to your e-mail, my discussion with Central Garden & Pet and our brief conversation, this is to state that the agreed to name for this attractant product is Starbar® Fly Attractant.

Regards,
Iain

Iain Weatherston, Ph.D.
J&T Associates LLC
4061 North 156th Drive
GOODYEAR, AZ 85395
623-535-4055 (Office)
623-217-9013 (Cell)
iweatherston@cox.net

From: "Bryceland, Andrew" <Bryceland.Andrew@epa.gov>
Date: Tuesday, June 16, 2015 at 5:23 AM
To: Iain Weatherston <iweatherston@cox.net>
Cc: "Pfeifer, Chris" <Pfeifer.Chris@epa.gov>, "Hollis, Linda" <Hollis.Linda@epa.gov>
Subject: 89459-RR - Question on product name.

Iain,

We are trying to finish up this registration. The label has the product name "Starbar Fly Attractant." All the documentation in the application has the product name, "RF2182 Dry Fly Attractant." Which is the correct product name? Does your client wish to use both name, (main name and alternate brand name)? If you do not want to use "Starbar Fly Attractant," I will need a new label with the correct product name. Please respond as soon as you can so we can finish this up quickly. Call me if you have questions. Thank you.

Regards,
Andrew Bryceland
Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division
USEPA
(703)305-6928

Label Review

File Symbol: 89459-RR (11)

Date: 5/27/15

Reviewer: Chris Pfeifer

Site/Use	[Res /Ag /Both] [Food /Non-Food /Both]				
Tox Categories: (W)aived/(B)ridged	AcOral: W4 /AcDerm: W4 /AcInhl: W4 /EyeIrr: W4 /SkinIrr: W4 DermSens: N No contact. Product is in trap.				
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
Restricted Use Pesticide	-----	-----	-----		Ch 6
Product Name	✓				Pg 12-3
Company Name & Info	✓				Pg 15-1
Identification Numbers	✓				Ch 14
Net Contents	✓				Ch 17
Ingredients Statement	✓				Ch 5
Label Claims	✓				Ch 12
Alternate Formula			✓		5-12

Precautionary Statements

Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
KOROC	✓				3-1 & 9 7-3 & 4
Signal Word	✓				Ch 3 Ch 7 Ch 10
General Heading Precautionary Statements	✓				Ch 7
First Aid (PRN 20001-1)			✓	No Exposure	Ch 3 & 7

Hazards to Humans and Domestic Animals			✓	No Exposure	Ch 3, 7-3
PPE (WPS) Engineering Controls			✓	No Exposure	Ch 7, Pg 7-12 Pgs 10-4, 15
User Safety Requirements			✓	No Exposure	Ch 10
User Safety Recommendations			✓	No Exposure	Ch 10
Environmental Hazards			✓	No Exposure	Ch 8
Physical and Chemical Hazards			✓	No Exposure	Pg 3-4 Ch 9

Directions for USE (FIFRA Text, WPS plus Storage and Disposal)					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
Header Directions for Use	✓				10-16
Violation of Federal Law text	✓				10-26, 11-7
WPS Text (PPE)			✓		Ch 10, 7-1 7-11
Non-WPS Text	✓				7-12, Ch 10
Storage and Disposal	✓				11-16, Ch 13
Directions for Use (General Instructions and Information)					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
General Instructions and Sub-Header	✓				
Chemigation / Prohibition			✓		PRN
REI			✓		Pg 10-20
Directions for Use					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
General Info. (non-site specific info. on uses, pests, mixing, and loading, tank mixing, etc.)	✓				
General Precautions and Restrictions	✓				
Directions for Use					
Directions for Application	✓				
Warranty Information					
Consistency with label instructions	✓				12-6
Not false or misleading	✓				
<p>"The warranty section contains an overly broad statement concerning limitations of liability. As such, this statement may be misleading and may constitute misbranding under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). It is suggested that the existing statement be preceded by the phrase, To the extent allowable by state law, or otherwise qualified to make it clear that this warranty is not intended to be a statement of law which implies that the buyer has no legal rights to recover damages from the manufacturer if he/she suffered a loss or injury from the product and concludes that it would be futile to pursue what might in reality be a valid claim."</p>					

BASIC CHECK LIST FOR CONFIDENTIAL STATEMENT OF FORMULAS (CSF)

Please note that if you have any questions at any point, especially with chemical or microbial names, consult with a chemist/ product characterization scientist. It may be helpful to make a copy of the CSF for marking comments, questions, and needed corrections. Upon completion of this form, consult the above scientists. And have them check over the CSF along with your comments.

EPA Reg#/ File Symbol: 89459-RR (11) CSF(s) dated: 6/17/14 REVIEW DUE DATE: 5/27/15

1. Compare CSF with prior CSF(s), and determine what is different.

Notes: NA

2. Examine label. Does this product have food or feed use sites? No.

3. Is each field filled out on CSF? ☒yes ☐no

Missing: NA

4. Is box 18 signed? ☒yes ☐no

5. Are addresses complete, including zipcodes in boxes 1, 2, and 11? ☒yes ☐no

Deficiencies:

6. Have they enclosed a Material Safety Data Sheet (MSDS) for each new ingredient?

☒yes ☐no

Deficiencies: NA.

7. In column 10. for each component is the chemical name, trade name and CAS No. listed? Is it clear what each component is? For any microbial ingredient, in column 10 - the description should include Colony forming units per gram (CFU/g) and cell collection identity number (E.g. ATCC 889-

34.) ☒yes ☐no

Deficiencies: NA. Everything is accounted for.

8. Using a chemical catalog, or Refs verify the CAS #, and chemical name for each component under consideration. Also Note any toxicological information disclosed in catalog.

Deficiencies: NA. CAS#s are correct.

9. Determine PC codes for each component and write these in "EPA USE ONLY" column. Does each component have a PC Code? If code(s) are not found, it may be necessary to send request form to RD. ☒yes ☐no

10. For each inert component determine whether it is listed under 40 CFR 180.1001 (910-960). And write these codes in "EPA USE ONLY" column. (Names may be confusing- consult with a chemist if needed) *If this product is for feed or food use, all inert ingredients **MUST** have appropriate clearance.*

Comments: Non-food. Inerts all clear for non-food use.

11. For each inert component that does not have 40 CFR clearance determine whether it is a list 1, 2, 3, 4(a) , or 4(b) inert. Write this information in "EPA USE ONLY" column. References to consult: www.epa.gov/opprd001/inerts and FR Vol. 63, No. 121 pages 34384-34390. If any of the inert ingredients are listed as "No longer used" in the above FR vol.63 notice, or are on list 1 or 2, this is a problem to bring attention to chemist.

Problem inerts? No.

12. If product used on food or feed, confirm active ingredient(s) has an established tolerance or exemption from food tolerance. (Consult Alphabetical listing in part 180 of 40 CFR pages 296-300, or the pesticide petition file jacket) ☐ yes ☐ no ☒ NA

Comments: Non-food.

13. Do certified limits for EACH component agree with 40 CFR 158.175?

Amount in Column 13 b.	Prescribed limits	Upper Limit	Lower Limit
≤1%	$N \pm 10\%N$	$N \times 1.1$	$N \times 0.9$
>1% but ≤20%	$N \pm 5\%N$	$N \times 1.05$	$N \times 0.95$
>20%	$N \pm 3\%N$	$N \times 1.03$	$N \times 0.97$

N= amount in Column 13 b. = nominal concentration

Calculate upper and lower limits using table above and compare with those listed in columns 14 a. and 14 b. of submitted CSF. If they do not agree, identify difference(s): Every calculation is within the proscribed limits or allowable proposed limits.

14. Does the sum of the numbers in column 13. a. equal total listed in box 17?

☒ yes ☐ no

15 Does column 13. b. add up to 100%? ☒ yes ☐ no

16. If Alternative Formulation box is checked in box A- Is there another CSF for a Basic Formulation on file?? ☐ yes ☐ no ☒ NA

17. Other issues? No.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Office of Chemical Safety and Pollution Prevention

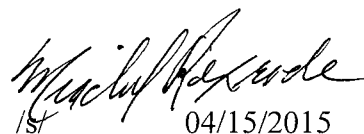
MEMORANDUM

April 15, 2015

SUBJECT: Ecotoxicity Assessment for Dry Fly Attractant

EPA Reg. #: 89459-RR
DP# 420501
Decision # 491257
Chemical Class Biochemical

FROM: Miachel Rexrode, Ph.D., Senior Biologist
Biochemical Pesticides Branch
Biopesticide & Pollution Prevention Division (7511P)


/s/ 04/15/2015

TO: Menyon Adams, Regulatory Action Leader /s/
Biochemical Pesticides Branch
Biopesticide & Pollution Prevention Division (7511P)

ACTION REQUESTED

The applicant, Central Garden & Pet Co., has submitted an application for the registration of RF2182 Dry Fly Attractant, a biochemical attractant end-use product used in conjunction with various traps to control house flies and other filth flies around stables, commercial dairies, feedlots and other farm areas. This end use product is formulated with three active ingredients Indole, Trimethylamine, and Putrescent Whole Egg solids of which the applicant has submitted data matrices, a draft master label, and Confidential Statement of Formulation (CSF), as well as, data waiver request for toxicology requirements and nontarget ecological testing.

RECOMMENDATIONS AND CONCLUSIONS

Background

Putrescent Whole Egg Solids

The Agency believes there is a category of pesticides for which a greatly reduced set of data requirements are appropriate. Such pesticides may be exempt from the usual generic data requirements for toxicology, residue chemistry, human exposure, ecological effects and environmental fate, without compromising human health or environmental safety. The RED (21T-100x June 1992) states that Putrescent Whole Egg Solids are in this category of pesticides, and EPA has waived most of the generic data requirements for their reregistration. Putrescent Whole Egg Solids (including inedible egg powder, dried whole egg and powdered inedible egg solids) are produced from eggs that the U.S. Department of Agriculture has declared inedible for human consumption due to cracked shells or imperfections. They are, therefore, a natural product, high in protein, fat, vitamins and minerals. Used as pesticides, Putrescent Whole Egg Solids have a non-toxic mode of action for repelling animals. They are presumed to be non-persistent since they are organic and are known to rapidly degrade in the environment. EPA has received no reports of adverse effects resulting from their use and the Agency believes that no significant adverse effects to the environment are associated with the use of putrescent whole egg solids as pesticides. PWES are exempt from the requirement of a tolerance under 40 CFR 180.1071(a):

(Z)-9-Tricosene

(Z)-9-Tricosene is a semiochemical that acts as a mating pheromone in the house fly (*Musca domestica*). It is naturally synthesized from nervonic acid in epidermal microsomes of the female house fly and deposited in the cuticular waxes and in the feces (Carlson *et. al.*, 1971; Reed *et. al.*, 1994). Naturally occurring semiochemicals, such as (Z)-9-Tricosene, are ubiquitous in the environment (see review by Jones, 2012) and are produced whenever arthropods are mating.

Indole

Indole-3-butyric acid (IBA) is a synthetic plant growth regulator that acts on cell division and cell elongation in order to stimulate root development to herbaceous and woody plant cuttings prior to planting in various propagation media. IBA is also used alone or in combination with other active ingredients on fruit and vegetable crops, field crops and ornamental turf to promote growth development of flowers and fruit and to increase crop yields. IBA has been classified as a biochemical pesticide because it is similar in structure and function to the naturally-occurring plant growth hormone indole-3-acetic acid (IAA).

Waiver Request

Waiver Request for Toxicological Data on RF2182 Dry Fly Attractant

Acute Oral 870.1100, Acute Dermal 870.1200, Acute Inhalation 870.1300, Acute Eye Irritation 870.2400, Acute Skin Irritation 870.2500, and Skin Sensitization 870.2600.

Agency Response: Acceptable

Waiver Request for Toxicological Data on Indole

The applicant has also presented rationale that could be used for waivers on the following acute studies: Acute Inhalation (870.1300) and Skin Sensitization (870.2600).

The applicant has also presented rationale that could be used for waivers on the following subchronic studies: Subchronic Oral (OCSPP 870.3100), Subchronic Dermal (OCSPP 870.3250), Subchronic Inhalation (OCSPP 870.3465), Prenatal Developmental toxicity (OCSPP 870.3700), Bacterial Reverse Mutation Test (OCSPP 870.5100) and *in vitro* mammalian cell assay (OCSPP 870.5375). The rationale that the applicant provided notes that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure.

Agency Response: Acceptable

Waiver Request for Toxicological Data on Trimethylamine

Since the proposed use of trimethylamine as an attractant in fly traps precludes contact with skin, a waiver is requested for Skin Sensitization 870.2600.

The applicant has also asked for waivers on the following studies: Subchronic Oral (OCSPP 870.3100), Subchronic Dermal (OCSPP 870.3250), Subchronic Inhalation (OCSPP 870.3465), Prenatal Developmental toxicity (OCSPP 870.3700), Bacterial Reverse Mutation Test (OCSPP 870.5100) and *in vitro* mammalian cell assay (OCSPP 870.5375). The rationale that the applicant provided notes that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure.

Agency Response: Acceptable

Waiver Request for Toxicological Data on Putrescent Whole Egg solids

The EPA reviewed the Putrescent Whole Egg Solids registration in 1992 and 2012 (EPA 1992 and 2011) as part of the Registration Review and concluded that the Agency will continue to waive generic toxicology data requirements. The applicant also provided rationale that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure. The waived data includes the following: Acute Oral 870.1100, Acute Dermal 870.1200, Acute Eye Irritation 870.2400, Acute Inhalation (870.1300), acute dermal irritation 870.2500, Skin Sensitization (870.2600), Subchronic Oral (OCSPP 870.3100), Subchronic Dermal (OCSPP 870.3250), Subchronic Inhalation (OCSPP 870.3465), Prenatal Developmental toxicity (OCSPP 870.3700), Bacterial Reverse Mutation Test (OCSPP 870.5100) and *in vitro* mammalian cell assay (OCSPP 870.5375).

Agency Response: Acceptable

Waiver Request for Nontarget Testing on Indole, Trimethylamine, and Putrescent Whole Egg solids

Avian Acute Oral 850.2100, Avian Dietary 850.2200, Fish Acute Toxicity 850.1075, Acute Aquatic Invertebrate 850.1010, Terrestrial Plant Toxicity 850.4100 and 4150, Nontarget Insect 880.4350.

Agency Response: Acceptable

II) PHYSICAL/CHEMICAL PROPERTIES (OCSPP 830.6000/7000)

Results: The physical/chemical characteristics of Indole, Trimethylamine, and Putrescent Egg Solids are provided in Tables 1.0 – 3.0

Table 1.0. Physical and Chemical Properties for Indole

Guideline Reference No./Property	Description of Result	Methods/Reference
830.6302 Color	White	Visual observation at room temperature/Toxnet/HSDB
830.6303 Physical State	Crystalline solid	Visual observation at room temperature/Toxnet/HSDB
830.6304 Odor	Dilute: jasmine or flowery Concentrated: fecal	Toxnet/HSDB
830.6313 Stability	1 yr Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	MRID 49375301
830.6314 Oxidation/Reduction: Chemical Incompatibility	Not applicable for biochemical pesticides.	
830.6315 Flammability	Does not contain combustible liquids.	
830.6317 Storage Stability	1 year. Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	
830.6319 Miscibility	Not applicable, the product is not an emulsifiable liquid and is not to be diluted with petroleum solvents.	
830.6320 Corrosion Characteristics	EP: in progress.	
830.6321 Dielectric Breakdown Voltage	Not applicable.	
830.7000 pH	5.9 (20° C)	Acros Organic Safety Data Sheet.
830.7100 Viscosity	EP: Not Applicable EP is solid Not required for TGAI.	
830.7050 UV/Visible light absorption	218 nm, 271 nm, 287 nm	
830.7200 Melting Range	52° C	Toxnet/HSDB
830.7220 Boiling Range	254° C	Toxnet/HSDB
830.7300 Density/Relative Density/Bulk Density	1.22 g/cc	Toxnet/HSDB
830.7520 Particle size, fiber length, and diameter distribution	Not applicable	
830.7370 Dissociation Constant in Water	2.4 (pka)	Toxnet/HSDB
830.7550 Partition Coefficient	TGAI2.14 (log Kow)	MRID 49375301
830.7840 Water Solubility	3560 mg/l	Toxnet/HSDB
830.7950 Vapor Pressure	0.0122 mg Hg @ 25° C	Toxnet/HSDB

Deficiencies: None

Table 2.0. Physical and Chemical Properties for Trimethylamine

Guideline Reference No./Property		Description of Result	Methods/Reference
830.6302	Color	White	Toxnet/HSDB/Espris COA
830.6303	Physical State	Crystalline solid	Toxnet/HSDB/ Espris COA
830.6304	Odor	Strong "fishy" odor in low concentrations and an ammonia-like odor at higher concentrations	Toxnet/HSDB
830.6313	Stability	Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	MRID 49375301
830.6314	Oxidation/Reduction: Chemical Incompatibility	Not applicable for biochemical pesticides.	
830.6315	Flammability	Does not contain combustible liquids.	
830.6317	Storage Stability	1 year. Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	MRID 49375301
830.6319	Miscibility	Not applicable, the product is not an emulsifiable liquid and is not to be diluted with petroleum solvents.	
830.6320	Corrosion Characteristics	EP: in progress.	
830.7000	pH	4.5 – 6.5 (20° C)	MRID 49375301
830.7100	Viscosity	EP: Not Applicable EP is solid Not required for TGAI.	
830.7050	UV/Visible light absorption	Not Required	
830.7200	Melting Range	277 – 283° C	MRID 49375301
830.7220	Boiling Range	Not applicable.	
830.7300	Density/Relative Density/Bulk Density	1.04 g/cc @ 20° C	Toxnet/HSDB
830.7520	Particle size, fiber length, and diameter distribution	Not applicable..	
830.7370	Dissociation Constant in Water	2.4 (pka)	Toxnet/HSDB
830.7550	Partition Coefficient	2.73 (log Kow)	Toxnet/Chem
830.7840	Water Solubility	1.00E + 06 mg/L @ 25° C	Toxnet/Chem
830.7950	Vapor Pressure	1.66E-06 mg Hg @ 25° C	Toxnet/Chem

Deficiencies: None

Table 3.0. Physical and Chemical Properties for Putrescent Egg Solids			
Guideline Reference No./Property		Description of Result	Methods/Reference
830.6302	Color	Orange-beige-light brown	MRID 42072103
830.6303	Physical State	powder	MRID 42072103
830.6304	Odor	Malty	MRID 42072103
830.6313	Stability	Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	MRID 42072103
830.6314	Oxidation/Reduction: Chemical Incompatibility	Not applicable for biochemical pesticides.	
830.6315	Flammability	Does not contain combustible liquids.	
830.6317	Storage Stability	EP: in progress.	MRID 42072103
830.6319	Miscibility	Not applicable, the product is not an emulsifiable liquid and is not to be diluted with petroleum solvents.	
830.6320	Corrosion Characteristics	EP: in progress.	
830.7000	pH	6.4 (10 % solution)	MRID 42072103
830.7100	Viscosity	EP: Not Applicable EP is solid Not required for TGAI.	
830.7050	UV/Visible light absorption	Not Required	
830.7200	Melting Range	When heat is applied to the substance there is a gradual change in color from light to brown/black. There is decomposition before melting can be observed.	Registration Review EPA-HQ-OPP-2010-0726
830.7220	Boiling Range	Not applicable.	
830.7300	Density/Relative Density/Bulk Density	0.514 g/cc @ 20° C	MRID 42072103
830.7520	Particle size, fiber length, and diameter distribution	Not applicable.	
830.7370	Dissociation Constant in Water	Not applicable	
830.7550	Partition Coefficient	Not anticipated as being needed to be required based on known physical and chemical properties of the ai.	Registration Review EPA-HQ-OPP-2010-0726
830.7840	Water Solubility	Insoluble	MRID 42072103
830.7950	Vapor Pressure	Not applicable.	

Deficiencies: None

Table 4.0. Physical and Chemical Properties for RF2182 Dry Fly Attractant

Guideline Reference No./Property		Description of Result	Reference
830.6302	Color	Off-white	MRID 49375302
830.6303	Physical State	Granular solid	MRID 49375302
830.6304	Odor	Fish like	MRID 49375302
830.6313	Stability	In progress	MRID 49375302
830.6314	Oxidation/Reduction: Chemical Incompatibility	Not applicable for biochemical pesticides.	
830.6315	Flammability	Does not contain combustible liquids. NA	
830.6317	Storage Stability	In progress as part of RF2182 Dry Fly Attractant.	MRID 49375302
830.6319	Miscibility	NA	
830.6320	Corrosion Characteristics	In progress as part of RF2182 Dry Fly Attractant.	
830.7000	pH	NA	MRID 49375302
830.7100	Viscosity	NA for EP (solid)	
830.7050	UV/Visible light absorption	NA	
830.7200	Melting Range	Turns dark and decomposes before melting	
830.7220	Boiling Range	NA	
830.7300	Density/Relative Density/Bulk Density	0.77 g/cc @ 20° C	MRID 49375302
830.7520	Particle size, fiber length, and diameter distribution	NA	
830.7370	Dissociation Constant in Water	NA	
830.7550	Partition Coefficient	NA	
830.7840	Water Solubility	NA	MRID 49375302
830.7950	Vapor Pressure	NA	

Deficiencies: None

Formulation Process (880.1200)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Enforcement Analytical Method (OCSPP 830.1800)

This guideline requirement is satisfied by the report to be found in MRID 49375302 of this application.

III) TOXICOLOGY**Toxicology: Indole-3-Butaric Acid**

Toxicology data submitted by the applicant (Table 7.0) shows that Indole-3-Butaric acid has an Acute Oral toxicity of LD₅₀ = 1,000 mg/kg (Tox Category III), Acute Dermal LD₅₀ = 790 mg/kg (Tox. Category II), Acute Eye Irritation showed corneal involvement and irritation clearing in 8-21 days (Tox. Category II), and Acute Dermal Irritation showed no irritation at 72 hours (Tox. Category IV).

Since the proposed use of Indole is as an attractant in fly traps will result in no direct contact with skin and little or no inhalation exposure, the applicant has asked for waivers on the following acute studies: Acute Inhalation (870.1300) and Skin Sensitization (870.2600).

The waiver rationales and acute toxicity profile for Indole-3-Butaric Acid are sufficient to grant waivers

The applicant has also presented rationale that could be used for waivers on the following subchronic studies: Subchronic Oral (OCSPP 870.3100), Subchronic Dermal (OCSPP 870.3250), Subchronic Inhalation (OCSPP 870.3465), Prenatal Developmental toxicity (OCSPP 870.3700), Bacterial Reverse Mutation Test (OCSPP 870.5100) and *in vitro* mammalian cell assay (OCSPP 870.5375). The rationale that the applicant provided notes that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure. **The waiver rationales and acute toxicity profile for Indole-3-Butaric Acid are sufficient to grant waivers for the studies noted above.**

Table 7.0. Acute Toxicological Values for Indole-3-Butaric Acid

Guideline	Study	Results	Toxicity Category	MRID #
870.1100	Acute Oral toxicity (rat)	LD ₅₀ = 1,000 mg/kg	III	49375305
870.1200	Acute Dermal Toxicity (rabbit)	LD ₅₀ =790 mg/kg	II	49375305
870.1300	Acute Inhalation Toxicity (rat)	Waiver request Acceptable		49375305
870.2400	Primary Eye Irritation (rabbit)	Severe eye irritant clearing in 8-21 days	II	49375305
870.2500	Primary Dermal Irritation (rabbit)	Waiver request Acceptable		49375305

Guideline	Study	Results	Toxicity Category	MRID #
870.2600	Skin Sensitization	Waiver request Acceptable		49375305
870.3050	90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3100	90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3250	90-Day Inhalation -rat	Waiver Request Acceptable		49375305
870.3700	Prenatal developmental	Waiver Request Acceptable		49375305
870.5100	Bacterial reverse Mutation	Waiver Request Acceptable		49375305
870.5300	<i>In vitro</i> Mammalian Cell assay	Waiver Request Acceptable		49375305

Deficiencies: Waivers Acceptable

Toxicology: Trimethylamine

Summaries of mammalian toxicity values for Trimethylamine are listed in (Table 8.0) and show that this compound has an Acute Oral toxicity of LD₅₀ = 460 - 766 mg/kg (Tox Category III), Acute Dermal LD₅₀ > 5,000 mg/kg (Tox. Category IV), Acute Inhalation LC₅₀ > 5.9 mg/L (Tox. Category IV), Acute Eye Irritation showed severe irritation, corneal damage, and bleeding (Tox. Category I), Acute Dermal Irritation showed that Trimethylamine is highly corrosive (Tox. Category I). Since the proposed use of trimethylamine as an attractant in fly traps precludes contact with skin, a waiver is requested for Skin Sensitization 870.2600.

The applicant has asked for waivers on the following studies: Acute Inhalation (870.1300) and Skin Sensitization (870.2600), Subchronic Oral (OCSPP 870.3100), Subchronic Dermal (OCSPP 870.3250), Subchronic Inhalation (OCSPP 870.3465), Prenatal Developmental toxicity (OCSPP 870.3700), Bacterial Reverse Mutation Test (OCSPP 870.5100) and *in vitro* mammalian cell assay (OCSPP 870.5375). The rationale that the applicant provided notes that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure. **The waiver rationales and acute toxicity profile for Trimethylamine are sufficient to grant waivers for the studies noted above.**

Table 8.0. Acute Toxicological Values for Trimethylamine

Guideline	Study	Results	Toxicity Category	MRID #
870.1100	Acute Oral toxicity (rat)	LD ₅₀ = 460 - 766 mg/kg	III	49375305
870.1200	Acute Dermal Toxicity (rabbit)	LD ₅₀ > 5,000 mg/kg	IV	49375305

Guideline	Study	Results	Toxicity Category	MRID #
870.1300	Acute Inhalation Toxicity (rat)	LC ₅₀ > 5.9 mg/L	IV	49375305
870.2400	Primary Eye Irritation (rabbit)	Severe irritation, corneal damage, and bleeding	I	49375305
870.2500	Primary Dermal Irritation (rabbit)	Highly corrosive	I	49375305
870.2600	Skin Sensitization	Waiver Request Acceptable		49375305
870.3050	90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3100	90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3250	90-Day Inhalation -rat	Waiver Request Acceptable		49375305
870.3700	Prenatal developmental	Waiver Request Acceptable		49375305
870.5100	Bacterial reverse Mutation	Waiver Request Acceptable		49375305
870.5300	<i>In vitro</i> Mammalian Cell assay	Waiver Request Acceptable		49375305

Deficiencies: Waivers Acceptable

Toxicology: Putrescent Whole Egg Solids

The EPA reviewed the Putrescent Whole Egg Solids registration in 1992 and 2012 (EPA 1992 and 2011) as part of the Registration Review and concluded that the Agency will continue to waive generic toxicology data requirements. The applicant also provided rationale that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure.

Table 9.0 Acute Toxicological Values for Putrescent Whole Egg Solids

Guideline	Study	Results	Toxicity Category	MRID #
870.1100	Acute Oral toxicity (rat)	Waiver Request Acceptable		49375305
870.1200	Acute Dermal Toxicity (rabbit)	Waiver Request Acceptable		49375305
870.1300				49375305

Guideline		Study	Results	Toxicity Category	MRID #
		Acute Inhalation Toxicity (rat)	Waiver Request Acceptable		
870.2400		Primary Eye Irritation (rabbit)	Waiver Request Acceptable		49375305
870.2500		Primary Dermal Irritation (rabbit)	Waiver Request Acceptable		49375305
870.2600		Skin Sensitization	Waiver Request Acceptable		49375305
870.3050		90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3100		90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3250		90-Day Inhalation - rat	Waiver Request Acceptable		49375305
870.3700		Prenatal developmental	Waiver Request Acceptable		49375305
870.5100		Bacterial reverse Mutation	Waiver Request Acceptable		49375305
870.5300		<i>In vitro</i> Mammalian Cell assay	Waiver Request Acceptable		49375305

Deficiencies: Waivers Acceptable

Toxicology RF2182 Dry Fly Attractant

The applicant has requested waivers for all required acute toxicity data that include the following: Acute Oral 870.1100, Acute Dermal 870.1200, Acute Inhalation 870.1300, Acute Eye Irritation 870.2400, Acute Skin Irritation 870.2500, and Skin Sensitization 870.2600. The rationale for these waivers notes that the product is intended for use in a fly trap where there is little or no potential for skin, eye, or oral exposure. The ingredients of the formulation have low toxicity or are present in low concentrations and are presented as a dry powder packaged in a water soluble pouch that is placed in the fly trap mechanism. The product is then activated with the addition of water. **The Agency agrees with this rationale for waivers.**

Table 10.0 Acute Toxicological Values for RF2182 Dry Fly Attractant

Guideline		Study	Results	Toxicity Category	MRID #
870.1100		Acute Oral toxicity (rat)	Waiver Request Acceptable		49375305
870.1200		Acute Dermal Toxicity (rabbit)	Waiver Request Acceptable		49375305
870.1300					49375305

Guideline		Study	Results	Toxicity Category	MRID #
		Acute Inhalation Toxicity (rat)	Waiver Request Acceptable		
870.2400		Primary Eye Irritation (rabbit)	Waiver Request Acceptable		49375305
870.2500		Primary Dermal Irritation (rabbit)	Waiver Request Acceptable		49375305
870.2600		Skin Sensitization	Waiver Request Acceptable		49375305
870.3050		90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3100		90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3250		90-Day Inhalation - rat	Waiver Request Acceptable		49375305
870.3700		Prenatal developmental	Waiver Request Acceptable		49375305
870.5100		Bacterial reverse Mutation	Waiver Request Acceptable		49375305
870.5300		<i>In vitro</i> Mammalian Cell assay	Waiver Request Acceptable		49375305

Deficiencies: Waivers Acceptable

IV) Ecological Effects

Waiver Request for Environmental Non-target Organism and Fate Data

The applicant has requested waivers for the following required studies for Indole, Trimethylamine and Putrescent whole eggs on non-target organisms: Avian Acute Oral 850.2100, Avian Dietary 850.2200, Fish Acute Toxicity 850.1075, Acute Aquatic Invertebrate 850.1010, Terrestrial Plant Toxicity 850.4100 and 4150, Nontarget Insect 880.4350. The Agency has listed some toxicity data for Indole, Putrescent Whole Eggs, and Trimethylamine that shows slight to practically nontoxic effects to avian and aquatic organisms and since the end product is packaged in pouches that are set in a trap apparatus, the potential for exposure of the Dry Fly Attractant to avian and aquatic species is not expected. The proposed use of Indole, Trimethylamine, and Putrescent Whole Eggs in the end product, RF2182 Dry Fly Attractant should not result in any ecological concern. **The Agency accepts the applicant's waiver rationale for these studies.**

Deficiencies: Waivers Acceptable

References

Central Garden & Pet Company (2014) Submission of Product Chemistry, Toxicity and Efficacy Data in Support of the Application for Registration of RF2182 Dry Fly Attractant. Transmittal of 10 Studies. 05-May-2014. **MRID 49375300**

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Mizens, M. (2013) Toxicology, Non-Target Organisms and Environmental Fate of Indole, Trimethylamine and Putrescent Egg Solids, Active Ingredients in RF2182 Dry Fly Attractant Request for Waivers of Specific Data Requirements. Unpublished study prepared by Central Garden and Pet Company. 95p. 05-May-2014. **MRID 49375305**

Mizens, M. (2013) Toxicology of RF2182 Dry Fly Attractant Request for Waivers of Specific Data Requirements. Unpublished study prepared by Central Garden and Pet Company. 115p. 05-May-2014. **MRID 49375306**

Weatherston, I.; McFadden, T. (2013) Product Chemistry of Indole, Trimethylamine, and Putrescent Egg Solids the Active Ingredients of RF2182 Dry Fly Attractant. Unpublished study prepared by Central Garden and Pet Company. 55p. 05-May-2014. **MRID 49375301**

Weatherston, I.; McFadden, T. (2013) Product Chemistry of RF2182 Dry Fly Attractant. Project Number: N995, 4468. Unpublished study prepared by Wellmark International. 60p. 05-May-2014. **MRID 49375302**

Toxnet Toxicology Data Network 2013. Trimethylamine (CASRN: 75-50-3)
<http://toxnet.nlm.nih.gov>. United States Library of Medicine.

USEPA 2011. Putrescent Whole Egg Solids Final work Plan. Registration review Case number: 4079. Docket Number EPA-HQ-OPP-2010-0726. March 18, 2011.

Wong, R.; Nguyen, J.; Moorman, R. (2013) Product Chemistry of RF2182 Dry Fly Attractant Enforcement Analytical Method. Project Number: 4422, N995. Unpublished study prepared by Wellmark International. 55p. 05-May-2014. **MRID 49375304**

Fuentes, Clara

From: Jones, Russell
Sent: Wednesday, April 15, 2015 11:24 AM
To: Fuentes, Clara
Subject: Your Work Queue Update for Branch Production Meeting (as of 04/15/2015)

Priority	Active Ingredient (EPA Reg/File No.)	RAL	Type of study/data/waiver (Incl. MRID #s)	Status; Completion
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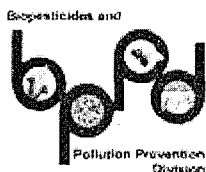
Fuentes, Clara				
1				
2				
3	Pelargonic Acid, Ammonium salt (79766-1)	CV. Walsh	Label Amendment with Data	In Queue
4	Pelargonic Acid, Ammonium salt (79766-5)	CV. Walsh	Label Amendment with Data	In Queue
5				
6				

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Chair, Biochemical Classification Committee

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Sent: Wednesday, April 15, 2015 11:24 AM
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Fuentes, Clara

1				
2				
3	Pelargonic Acid, Ammonium salt (79766-1)	CV. Walsh	Label Amendment with Data	In Queue
4	Pelargonic Acid, Ammonium salt (79766-5)	CV. Walsh	Label Amendment with Data	In Queue
5				
6				

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Office of Chemical Safety and Pollution Prevention

MEMORANDUM

April 15, 2015

SUBJECT: Ecotoxicity Assessment for Dry Fly Attractant

EPA Reg. #: 89459-RR
DP# 420501
Decision # 491257
Chemical Class Biochemical

FROM: Miachel Rexrode, Ph.D., Senior Biologist /s/ 04/15/2015
Biochemical Pesticides Branch
Biopesticide & Pollution Prevention Division (7511P)

TO: ~~Micahon Adams~~ **CHRIS PFEIFFER**, Regulatory Action Leader /s/
Biochemical Pesticides Branch
Biopesticide & Pollution Prevention Division (7511P)

ACTION REQUESTED

The applicant, Central Garden & Pet Co., has submitted an application for the registration of RF2182 Dry Fly Attractant, a biochemical attractant end-use product used in conjunction with various traps to control house flies and other filth flies around stables, commercial dairies, feedlots and other farm areas. This end use product is formulated with three active ingredients Indole, Trimethylamine, and Putrescent Whole Egg solids of which the applicant has submitted data matrices, a draft master label, and Confidential Statement of Formulation (CSF), as well as, data waiver request for toxicology requirements and nontarget ecological testing.

RECOMMENDATIONS AND CONCLUSIONS

Background

Putrescent Whole Egg Solids

The Agency believes there is a category of pesticides for which a greatly reduced set of data requirements are appropriate. Such pesticides may be exempt from the usual generic data requirements for toxicology, residue chemistry, human exposure, ecological effects and environmental fate, without compromising human health or environmental safety. The RED (21T-100x June 1992) states that Putrescent Whole Egg Solids are in this category of pesticides, and EPA has waived most of the generic data requirements for their reregistration. Putrescent Whole Egg Solids (including inedible egg powder, dried whole egg and powdered inedible egg solids) are produced from eggs that the U.S. Department of Agriculture has declared inedible for human consumption due to cracked shells or imperfections. They are, therefore, a natural product, high in protein, fat, vitamins and minerals. Used as pesticides, Putrescent Whole Egg Solids have a non-toxic mode of action for repelling animals. They are presumed to be non-persistent since they are organic and are known to rapidly degrade in the environment. EPA has received no reports of adverse effects resulting from their use and the Agency believes that no significant adverse effects to the environment are associated with the use of putrescent whole egg solids as pesticides. PWES are exempt from the requirement of a tolerance under 40 CFR 180.1071(a):

(Z)-9-Tricosene

(Z)-9-Tricosene is a semiochemical that acts as a mating pheromone in the house fly (*Musca domestica*). It is naturally synthesized from nervonic acid in epidermal microsomes of the female house fly and deposited in the cuticular waxes and in the feces (Carlson *et. al.*, 1971; Reed *et. al.*, 1994). Naturally occurring semiochemicals, such as (Z)-9-Tricosene, are ubiquitous in the environment (see review by Jones, 2012) and are produced whenever arthropods are mating.

Indole

Indole-3-butyric acid (IBA) is a synthetic plant growth regulator that acts on cell division and cell elongation in order to stimulate root development to herbaceous and woody plant cuttings prior to planting in various propagation media. IBA is also used alone or in combination with other active ingredients on fruit and vegetable crops, field crops and ornamental turf to promote growth development of flowers and fruit and to increase crop yields. IBA has been classified as a biochemical pesticide because it is similar in structure and function to the naturally-occurring plant growth hormone indole-3-acetic acid (IAA).

Waiver Request

Waiver Request for Toxicological Data on RF2182 Dry Fly Attractant

Acute Oral 870.1100, Acute Dermal 870.1200, Acute Inhalation 870.1300, Acute Eye Irritation 870.2400, Acute Skin Irritation 870.2500, and Skin Sensitization 870.2600.

Agency Response: Acceptable

Waiver Request for Toxicological Data on Indole

The applicant has also presented rationale that could be used for waivers on the following acute studies: Acute Inhalation (870.1300) and Skin Sensitization (870.2600).

The applicant has also presented rationale that could be used for waivers on the following subchronic studies: Subchronic Oral (OCSPP 870.3100), Subchronic Dermal (OCSPP 870.3250), Subchronic Inhalation (OCSPP 870.3465), Prenatal Developmental toxicity (OCSPP 870.3700), Bacterial Reverse Mutation Test (OCSPP 870.5100) and *in vitro* mammalian cell assay (OCSPP 870.5375). The rationale that the applicant provided notes that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure.

Agency Response: Acceptable

Waiver Request for Toxicological Data on Trimethylamine

Since the proposed use of trimethylamine as an attractant in fly traps precludes contact with skin, a waiver is requested for Skin Sensitization 870.2600.

The applicant has also asked for waivers on the following studies: Subchronic Oral (OCSPP 870.3100), Subchronic Dermal (OCSPP 870.3250), Subchronic Inhalation (OCSPP 870.3465), Prenatal Developmental toxicity (OCSPP 870.3700), Bacterial Reverse Mutation Test (OCSPP 870.5100) and *in vitro* mammalian cell assay (OCSPP 870.5375). The rationale that the applicant provided notes that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure.

Agency Response: Acceptable

Waiver Request for Toxicological Data on Putrescent Whole Egg solids

The EPA reviewed the Putrescent Whole Egg Solids registration in 1992 and 2012 (EPA 1992 and 2011) as part of the Registration Review and concluded that the Agency will continue to waive generic toxicology data requirements. The applicant also provided rationale that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure. The waived data includes the following: Acute Oral 870.1100, Acute Dermal 870.1200, Acute Eye Irritation 870.2400, Acute Inhalation (870.1300), acute dermal irritation 870.2500, Skin Sensitization (870.2600), Subchronic Oral (OCSPP 870.3100), Subchronic Dermal (OCSPP 870.3250), Subchronic Inhalation (OCSPP 870.3465), Prenatal Developmental toxicity (OCSPP 870.3700), Bacterial Reverse Mutation Test (OCSPP 870.5100) and *in vitro* mammalian cell assay (OCSPP 870.5375).

Agency Response: Acceptable

Waiver Request for Nontarget Testing on Indole, Trimethylamine, and Putrescent Whole Egg solids

Avian Acute Oral 850.2100, Avian Dietary 850.2200, Fish Acute Toxicity 850.1075, Acute Aquatic Invertebrate 850.1010, Terrestrial Plant Toxicity 850.4100 and 4150, Nontarget Insect 880.4350.

Agency Response: Acceptable

II) PHYSICAL/CHEMICAL PROPERTIES (OCSP 830.6000/7000)

Results: The physical/chemical characteristics of Indole, Trimethylamine, and Putrescent Egg Solids are provided in Tables 1.0 – 3.0

Table 1.0. Physical and Chemical Properties for Indole			
Guideline Reference No./Property		Description of Result	Methods/Reference
830.6302	Color	White	Visual observation at room temperature/Toxnet/HSDB
830.6303	Physical State	Crystalline solid	Visual observation at room temperature/Toxnet/HSDB
830.6304	Odor	Dilute: jasmine or flowery Concentrated: fecal	Toxnet/HSDB
830.6313	Stability	1 yr Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	MRID 49375301
830.6314	Oxidation/Reduction: Chemical Incompatibility	Not applicable for biochemical pesticides.	
830.6315	Flammability	Does not contain combustible liquids.	
830.6317	Storage Stability	1 year. Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	
830.6319	Miscibility	Not applicable, the product is not an emulsifiable liquid and is not to be diluted with petroleum solvents.	
830.6320	Corrosion Characteristics	EP: in progress.	
830.6321	Dielectric Breakdown Voltage	Not applicable.	
830.7000	pH	5.9 (20° C)	Acros Organic Safety Data Sheet.
830.7100	Viscosity	EP: Not Applicable EP is solid Not required for TGA1.	
830.7050	UV/Visible light absorption	218 nm, 271 nm, 287 nm	
830.7200	Melting Range	52° C	Toxnet/HSDB
830.7220	Boiling Range	254° C	Toxnet/HSDB
830.7300	Density/Relative Density/Bulk Density	1.22 g/cc	Toxnet/HSDB
830.7520	Particle size, fiber length, and diameter distribution	Not applicable	
830.7370	Dissociation Constant in Water	2.4 (pka)	Toxnet/HSDB
830.7550	Partition Coefficient	TGA12.14 (log Kow)	MRID 49375301
830.7840	Water Solubility	3560 mg/l	Toxnet/HSDB
830.7950	Vapor Pressure	0.0122 mg Hg @ 25° C	Toxnet/HSDB

Deficiencies: None

Table 2.0. Physical and Chemical Properties for Trimethylamine

Guideline Reference No./Property		Description of Result	Methods/Reference
830.6302	Color	White	Toxnet/HSDB/Esprux COA
830.6303	Physical State	Crystalline solid	Toxnet/HSDB/ Esprux COA
830.6304	Odor	Strong "fishy" odor in low concentrations and an ammonia-like odor at higher concentrations	Toxnet/HSDB
830.6313	Stability	Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	MRID 49375301
830.6314	Oxidation/Reduction: Chemical Incompatibility	Not applicable for biochemical pesticides.	
830.6315	Flammability	Does not contain combustible liquids.	
830.6317	Storage Stability	1 year. Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	MRID 49375301
830.6319	Miscibility	Not applicable, the product is not an emulsifiable liquid and is not to be diluted with petroleum solvents.	
830.6320	Corrosion Characteristics	EP: in progress.	
830.7000	pH	4.5 – 6.5 (20° C)	MRID 49375301
830.7100	Viscosity	EP: Not Applicable EP is solid Not required for TGAI.	
830.7050	UV/Visible light absorption	Not Required	
830.7200	Melting Range	277 – 283° C	MRID 49375301
830.7220	Boiling Range	Not applicable.	
830.7300	Density/Relative Density/Bulk Density	1.04 g/cc @ 20° C	Toxnet/HSDB
830.7520	Particle size, fiber length, and diameter distribution	Not applicable..	
830.7370	Dissociation Constant in Water	2.4 (pka)	Toxnet/HSDB
830.7550	Partition Coefficient	2.73 (log Kow)	Toxnet/Chem
830.7840	Water Solubility	1.00E + 06 mg/L @ 25° C	Toxnet/Chem
830.7950	Vapor Pressure	1.66E-06 mg Hg @ 25° C	Toxnet/Chem

Deficiencies: None

Table 3.0. Physical and Chemical Properties for Putrescent Egg Solids			
Guideline Reference No./Property		Description of Result	Methods/Reference
830.6302	Color	Orange-beige-light brown	MRID 42072103
830.6303	Physical State	powder	MRID 42072103
830.6304	Odor	Malty	MRID 42072103
830.6313	Stability	Stable when stored in tightly sealed package in dry location away from direct heat or light (46-90° F).	MRID 42072103
830.6314	Oxidation/Reduction: Chemical Incompatibility	Not applicable for biochemical pesticides.	
830.6315	Flammability	Does not contain combustible liquids.	
830.6317	Storage Stability	EP: in progress.	MRID 42072103
830.6319	Miscibility	Not applicable, the product is not an emulsifiable liquid and is not to be diluted with petroleum solvents.	
830.6320	Corrosion Characteristics	EP: in progress.	
830.7000	pH	6.4 (10 % solution)	MRID 42072103
830.7100	Viscosity	EP: Not Applicable EP is solid Not required for TGAI.	
830.7050	UV/Visible light absorption	Not Required	
830.7200	Melting Range	When heat is applied to the substance there is a gradual change in color from light to brown/black. There is decomposition before melting can be observed.	Registration Review EPA-HQ-OPP-2010-0726
830.7220	Boiling Range	Not applicable.	
830.7300	Density/Relative Density/Bulk Density	0.514 g/cc @ 20° C	MRID 42072103
830.7520	Particle size, fiber length, and diameter distribution	Not applicable.	
830.7370	Dissociation Constant in Water	Not applicable	
830.7550	Partition Coefficient	Not anticipated as being needed to be required based on known physical and chemical properties of the ai.	Registration Review EPA-HQ-OPP-2010-0726
830.7840	Water Solubility	Insoluble	MRID 42072103
830.7950	Vapor Pressure	Not applicable.	

Deficiencies: None

Table 4.0. Physical and Chemical Properties for RF2182 Dry Fly Attractant			
Guideline Reference No./Property		Description of Result	Reference
830.6302	Color	Off-white	MRID 49375302
830.6303	Physical State	Granular solid	MRID 49375302
830.6304	Odor	Fish like	MRID 49375302
830.6313	Stability	In progress	MRID 49375302
830.6314	Oxidation/Reduction: Chemical Incompatibility	Not applicable for biochemical pesticides.	
830.6315	Flammability	Does not contain combustible liquids. NA	
830.6317	Storage Stability	In progress as part of RF2182 Dry Fly Attractant.	MRID 49375302
830.6319	Miscibility	NA	
830.6320	Corrosion Characteristics	In progress as part of RF2182 Dry Fly Attractant.	
830.7000	pH	NA	MRID 49375302
830.7100	Viscosity	NA for EP (solid)	
830.7050	UV/Visible light absorption	NA	
830.7200	Melting Range	Turns dark and decomposes before melting	
830.7220	Boiling Range	NA	
830.7300	Density/Relative Density/Bulk Density	0.77 g/cc @ 20° C	MRID 49375302
830.7520	Particle size, fiber length, and diameter distribution	NA	
830.7370	Dissociation Constant in Water	NA	
830.7550	Partition Coefficient	NA	
830.7840	Water Solubility	NA	MRID 49375302
830.7950	Vapor Pressure	NA	

Deficiencies: None

Formulation Process (880.1200)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Enforcement Analytical Method (OCSPP 830.1800)

This guideline requirement is satisfied by the report to be found in MRID 49375302 of this application.

III) TOXICOLOGY**Toxicology: Indole-3-Butaric Acid**

Toxicology data submitted by the applicant (Table 7.0) shows that Indole-3-Butaric acid has an Acute Oral toxicity of LD₅₀ = 1,000 mg/kg (Tox Category III), Acute Dermal LD₅₀ = 790 mg/kg (Tox. Category II), Acute Eye Irritation showed corneal involvement and irritation clearing in 8-21 days (Tox. Category II), and Acute Dermal Irritation showed no irritation at 72 hours (Tox. Category IV).

Since the proposed use of Indole is as an attractant in fly traps will result in no direct contact with skin and little or no inhalation exposure, the applicant has asked for waivers on the following acute studies: Acute Inhalation (870.1300) and Skin Sensitization (870.2600).

The waiver rationales and acute toxicity profile for Indole-3-Butaric Acid are sufficient to grant waivers

The applicant has also presented rationale that could be used for waivers on the following subchronic studies: Subchronic Oral (OCSPP 870.3100), Subchronic Dermal (OCSPP 870.3250), Subchronic Inhalation (OCSPP 870.3465), Prenatal Developmental toxicity (OCSPP 870.3700), Bacterial Reverse Mutation Test (OCSPP 870.5100) and *in vitro* mammalian cell assay (OCSPP 870.5375). The rationale that the applicant provided notes that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure. **The waiver rationales and acute toxicity profile for Indole-3-Butaric Acid are sufficient to grant waivers for the studies noted above.**

Table 7.0. Acute Toxicological Values for Indole-3-Butaric Acid

Guideline	Study	Results	Toxicity Category	MRID #
870.1100	Acute Oral toxicity (rat)	LD ₅₀ = 1,000 mg/kg	III	49375305
870.1200	Acute Dermal Toxicity (rabbit)	LD ₅₀ =790 mg/kg	II	49375305
870.1300	Acute Inhalation Toxicity (rat)	Waiver request Acceptable		49375305
870.2400	Primary Eye Irritation (rabbit)	Severe eye irritant clearing in 8-21 days	II	49375305
870.2500	Primary Dermal Irritation (rabbit)	Waiver request Acceptable		49375305

Guideline	Study	Results	Toxicity Category	MRID #
870.2600	Skin Sensitization	Waiver request Acceptable		49375305
870.3050	90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3100	90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3250	90-Day Inhalation -rat	Waiver Request Acceptable		49375305
870.3700	Prenatal developmental	Waiver Request Acceptable		49375305
870.5100	Bacterial reverse Mutation	Waiver Request Acceptable		49375305
870.5300	<i>In vitro</i> Mammalian Cell assay	Waiver Request Acceptable		49375305

Deficiencies: Waivers Acceptable

Toxicology: Trimethylamine

Summaries of mammalian toxicity values for Trimethylamine are listed in (Table 8.0) and show that this compound has an Acute Oral toxicity of LD₅₀ = 460 - 766 mg/kg (Tox Category III), Acute Dermal LD₅₀ > 5,000 mg/kg (Tox. Category IV), Acute Inhalation LC₅₀ > 5.9 mg/L (Tox. Category IV), Acute Eye Irritation showed severe irritation, corneal damage, and bleeding (Tox. Category I), Acute Dermal Irritation showed that Trimethylamine is highly corrosive (Tox. Category I). Since the proposed use of trimethylamine as an attractant in fly traps precludes contact with skin, a waiver is requested for Skin Sensitization 870.2600.

The applicant has asked for waivers on the following studies: Acute Inhalation (870.1300) and Skin Sensitization (870.2600), Subchronic Oral (OCSP 870.3100), Subchronic Dermal (OCSP 870.3250), Subchronic Inhalation (OCSP 870.3465), Prenatal Developmental toxicity (OCSP 870.3700), Bacterial Reverse Mutation Test (OCSP 870.5100) and *in vitro* mammalian cell assay (OCSP 870.5375). The rationale that the applicant provided notes that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure. **The waiver rationales and acute toxicity profile for Trimethylamine are sufficient to grant waivers for the studies noted above.**

Table 8.0. Acute Toxicological Values for Trimethylamine

Guideline	Study	Results	Toxicity Category	MRID #
870.1100	Acute Oral toxicity (rat)	LD ₅₀ = 460 - 766 mg/kg	III	49375305
870.1200	Acute Dermal Toxicity (rabbit)	LD ₅₀ > 5,000 mg/kg	IV	49375305

Guideline	Study	Results	Toxicity Category	MRID #
870.1300	Acute Inhalation Toxicity (rat)	LC ₅₀ > 5.9 mg/L	IV	49375305
870.2400	Primary Eye Irritation (rabbit)	Severe irritation, corneal damage, and bleeding	I	49375305
870.2500	Primary Dermal Irritation (rabbit)	Highly corrosive	I	49375305
870.2600	Skin Sensitization	Waiver Request Acceptable		49375305
870.3050	90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3100	90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3250	90-Day Inhalation -rat	Waiver Request Acceptable		49375305
870.3700	Prenatal developmental	Waiver Request Acceptable		49375305
870.5100	Bacterial reverse Mutation	Waiver Request Acceptable		49375305
870.5300	<i>In vitro</i> Mammalian Cell assay	Waiver Request Acceptable		49375305

Deficiencies: Waivers Acceptable

Toxicology: Putrescent Whole Egg Solids

The EPA reviewed the Putrescent Whole Egg Solids registration in 1992 and 2012 (EPA 1992 and 2011) as part of the Registration Review and concluded that the Agency will continue to waive generic toxicology data requirements. The applicant also provided rationale that the proposed end product is a fly attractant enclosed in a water soluble pouch with no oral exposure, and only transient human exposure.

Table 9.0 Acute Toxicological Values for Putrescent Whole Egg Solids

Guideline	Study	Results	Toxicity Category	MRID #
870.1100	Acute Oral toxicity (rat)	Waiver Request Acceptable		49375305
870.1200	Acute Dermal Toxicity (rabbit)	Waiver Request Acceptable		49375305
870.1300				49375305

Guideline		Study	Results	Toxicity Category	MRID #
		Acute Inhalation Toxicity (rat)	Waiver Request Acceptable		
870.2400		Primary Eye Irritation (rabbit)	Waiver Request Acceptable		49375305
870.2500		Primary Dermal Irritation (rabbit)	Waiver Request Acceptable		49375305
870.2600		Skin Sensitization	Waiver Request Acceptable		49375305
870.3050		90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3100		90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3250		90-Day Inhalation - rat	Waiver Request Acceptable		49375305
870.3700		Prenatal developmental	Waiver Request Acceptable		49375305
870.5100		Bacterial reverse Mutation	Waiver Request Acceptable		49375305
870.5300		<i>In vitro</i> Mammalian Cell assay	Waiver Request Acceptable		49375305

Deficiencies: Waivers Acceptable

Toxicology RF2182 Dry Fly Attractant

The applicant has requested waivers for all required acute toxicity data that include the following: Acute Oral 870.1100, Acute Dermal 870.1200, Acute Inhalation 870.1300, Acute Eye Irritation 870.2400, Acute Skin Irritation 870.2500, and Skin Sensitization 870.2600. The rationale for these waivers notes that the product is intended for use in a fly trap where there is little or no potential for skin, eye, or oral exposure. The ingredients of the formulation have low toxicity or are present in low concentrations and are presented as a dry powder packaged in a water soluble pouch that is placed in the fly trap mechanism. The product is then activated with the addition of water. **The Agency agrees with this rationale for waivers.**

Table 10.0 Acute Toxicological Values for RF2182 Dry Fly Attractant

Guideline		Study	Results	Toxicity Category	MRID #
870.1100		Acute Oral toxicity (rat)	Waiver Request Acceptable		49375305
870.1200		Acute Dermal Toxicity (rabbit)	Waiver Request Acceptable		49375305
870.1300					49375305

Guideline		Study	Results	Toxicity Category	MRID #
		Acute Inhalation Toxicity (rat)	Waiver Request Acceptable		
870.2400		Primary Eye Irritation (rabbit)	Waiver Request Acceptable		49375305
870.2500		Primary Dermal Irritation (rabbit)	Waiver Request Acceptable		49375305
870.2600		Skin Sensitization	Waiver Request Acceptable		49375305
870.3050		90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3100		90-day oral toxicity (rat)	Waiver Request Acceptable		49375305
870.3250		90-Day Inhalation - rat	Waiver Request Acceptable		49375305
870.3700		Prenatal developmental	Waiver Request Acceptable		49375305
870.5100		Bacterial reverse Mutation	Waiver Request Acceptable		49375305
870.5300		<i>In vitro</i> Mammalian Cell assay	Waiver Request Acceptable		49375305

Deficiencies: Waivers Acceptable

IV) Ecological Effects

Waiver Request for Environmental Non-target Organism and Fate Data

The applicant has requested waivers for the following required studies for Indole, Trimethylamine and Putrescent whole eggs on non-target organisms: Avian Acute Oral 850.2100, Avian Dietary 850.2200, Fish Acute Toxicity 850.1075, Acute Aquatic Invertebrate 850.1010, Terrestrial Plant Toxicity 850.4100 and 4150, Nontarget Insect 880.4350. The Agency has listed some toxicity data for Indole, Putrescent Whole Eggs, and Trimethylamine that shows slight to practically nontoxic effects to avian and aquatic organisms and since the end product is packaged in pouches that are set in a trap apparatus, the potential for exposure of the Dry Fly Attractant to avian and aquatic species is not expected. The proposed use of Indole, Trimethylamine, and Putrescent Whole Eggs in the end product, RF2182 Dry Fly Attractant should not result in any ecological concern. **The Agency accepts the applicant's waiver rationale for these studies.**

Deficiencies: Waivers Acceptable

References

Central Garden & Pet Company (2014) Submission of Product Chemistry, Toxicity and Efficacy Data in Support of the Application for Registration of RF2182 Dry Fly Attractant. Transmittal of 10 Studies. 05-May-2014. **MRID 49375300**

Kifle, A. (2013) Product Chemistry of RF2182 Dry Fly Attractant & Density of RF2182 Dry Fly Attractant. Project Number: 4468, N995. Unpublished study prepared by Wellmark International. 10p. 05-May-2014. **MRID 49375303**

Mizens, M. (2013) Toxicology, Non-Target Organisms and Environmental Fate of Indole, Trimethylamine and Putrescent Egg Solids, Active Ingredients in RF2182 Dry Fly Attractant Request for Waivers of Specific Data Requirements. Unpublished study prepared by Central Garden and Pet Company. 95p. 05-May-2014. **MRID 49375305**

Mizens, M. (2013) Toxicology of RF2182 Dry Fly Attractant Request for Waivers of Specific Data Requirements. Unpublished study prepared by Central Garden and Pet Company. 115p. 05-May-2014. **MRID 49375306**

Weatherston, I.; McFadden, T. (2013) Product Chemistry of Indole, Trimethylamine, and Putrescent Egg Solids the Active Ingredients of RF2182 Dry Fly Attractant. Unpublished study prepared by Central Garden and Pet Company. 55p. 05-May-2014. **MRID 49375301**

Weatherston, I.; McFadden, T. (2013) Product Chemistry of RF2182 Dry Fly Attractant. Project Number: N995, 4468. Unpublished study prepared by Wellmark International. 60p. 05-May-2014. **MRID 49375302**

Toxnet Toxicology Data Network 2013. Trimethylamine (CASRN: 75-50-3)
<http://toxnet.nlm.nih.gov>. United States Library of Medicine.

USEPA 2011. Putrescent Whole Egg Solids Final work Plan. Registration review Case number: 4079. Docket Number EPA-HQ-OPP-2010-0726. March 18, 2011.

Wong, R.; Nguyen, J.; Moorman, R. (2013) Product Chemistry of RF2182 Dry Fly Attractant Enforcement Analytical Method. Project Number: 4422, N995. Unpublished study prepared by Wellmark International. 55p. 05-May-2014. **MRID 49375304**

Pfeifer, Chris

From: Rexrode, Miachel
Sent: Wednesday, April 15, 2015 12:05 PM
To: Pfeifer, Chris
Subject: RE: Response to February 25 telephone call re application to register RF2182 Dry Fly Bait.[89459-?]
Attachments: Dry Fly attractant.docx

I made the changes

From: Pfeifer, Chris
Sent: Wednesday, April 15, 2015 11:22 AM
To: Rexrode, Miachel
Subject: FW: Response to February 25 telephone call re application to register RF2182 Dry Fly Bait.[89459-?]

From: Iain Weatherston [<mailto:iweatherston@cox.net>]
Sent: Sunday, March 01, 2015 11:15 PM
To: Pfeifer, Chris
Subject: Response to February 25 telephone call re application to register RF2182 Dry Fly Bait.[89459-?]

Chris:

Regarding our conversation of last week concerning potential deficiencies in the product chemistry of the RF 2182 Dry Fly Bait application, I have reviewed the application, two BRAD documents, Guideline OPPTS 830.7050 and Guidelines for the testing of chemicals, OECD 101, UV-VIS Absorption Spectra, as well as the RED and RED Fact Sheet for putrescent whole egg solids.

I believe that the applicant is not required to provide UV/visible spectra for three active ingredients, namely indole, trimethylamine and putrescent egg solids and that the manner in which this guideline was addressed in Volume 89459-?-2 of the application, as being "not applicable" is valid.

This finding is based on:

1. The application is to register an end-use product by means of the **Integrated System Procedure**, in the same manner as Bull Run Scientific, VBT used to register Bull Run Fly Attractant [84565-2] which also contains Indole, trimethylamine and putrescent egg solid. It can be shown that Bull Run Scientific, VBT were not required to supply EPA with A UV/Vis spectrum of at least trimethylamine and indole as a prerequisite to approval of their registration in June 2009 and hence Central Garden and Pet are also not required to produce such spectra.
2. Regarding trimethylamine please refer to the PC Code 221801 May 2009 BRAD, page 11, Table 2 where the description of the result of that requirement is "Not required for EP"

3. Regarding indole please refer to the PC Code 025000 May 2009 BRAD, page 13, Table 2 where the description of the result of that requirement is "Not required for EP"
4. Regarding the putrescent whole egg solids, this material is a complex mixture which is highly proteinaceous (50-55%), contains fats (28-34%) and vitamins and minerals. Any spectrum of such a complex mixture will not yield any usable data as to its photo degradation under atmospheric or aquatic conditions. It is also insoluble in water, alcohols and hydrocarbons which will make the measurement extremely difficult.
5. In both the OPPTS Guideline and the OECD document the stated purpose of this test is "to have some indication of the wavelengths at which the compounds may be susceptible to photochemical degradation. Since photochemical degradation is likely to occur in both the atmosphere and the aquatic environment....."
Note that in both BRAD's all non-target organism toxicity requirements were waived based on the proposed use pattern of the EP as being contained inside of a fly trap.
6. Please note and refer to Volume 89459-?-4 of the RF2182 Dry Fly Bait application where waivers for non-target organism and environmental fate data requirements are detailed for indole, trimethylamine and putrescent whole egg solids.

Based on the above Central Garden and Pet Company believes that there is no deficiency regarding the Guideline 830.7050 for trimethylamine, indole and putrescent whole egg solids and that a response of "not applicable" to this guideline is appropriate. If there are any questions or further information is required please do not hesitate to contact me at iweatherston@cox.net or by telephone at 623-535-4055.

Best regards,
Iain

Iain Weatherston, Ph.D.
J&T Associates LLC
4061 North 156th Drive,
GOODYEAR AZ 85395
623-535-4055
iweatherston@cox.net

DATA PACKAGE BEAN SHEET

Date: 08-Jul-2014

Page 1 of 3

Decision #: 491257

DP #: (421405)

PRIA

Parent DP #:

Submission #: 951816

E-Sub #:

*** Registration Information ***

Registration: 89459-RR - RF2182 DRY FLY ATTRACTANT

Company: 89459 - CENTRAL GARDEN & PET COMPANY

Risk Manager: RM 91 - Andrew Bryceland - (703) 308-6928 Room# PY1 S-8873

Risk Manager Reviewer: Jay Pfeifer JPFEIFER

Sent Date:

PRIA Due Date: 26-Jun-2015

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (B676) NEW PRODUCT; MORE THAN ONE ACTIVE INGREDIENT WHERE ONE ACTIVE ING

Ingredients: See page 3

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 08-Jul-2014

Due Back:

DP Ingredient: See page 3

DP Title: Application for Fly Attractant

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: BPPD / BPB

08-Jul-2014

Last Possible Science Due Date: 27-May-2015

Team Name: RM 91

08-Jul-2014

Science Due Date:

Reviewer Name: Jones, Russell

09-Jul-2014

Sub Data Package Due Date:

Contractor Name:

*** Studies Sent for Review ***

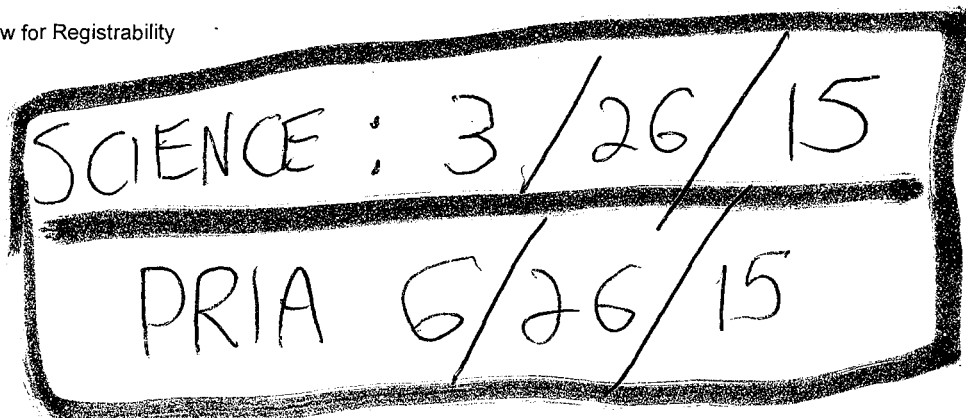
Printed on Page 2

*** Additional Data Package for this Decision ***

Can be printed on its own page

*** Data Package Instructions ***

Review for Registrability



Bryceland, Andrew

From: Bryceland, Andrew
Sent: Wednesday, June 25, 2014 7:52 AM
To: 'Iain Weatherston'
Cc: Pfeifer, Jay
Subject: 89459-RR - cleared 45-90 day technical screen

Dear Dr. Weatherston,

I wanted to inform you that your pending PRIA application for RF2182 Dry Fly Attractant (EPA File Symbol: 89459-RR; Decision No.: 491257; B676) has cleared the Technical Screen, been assigned to a RAL, and will now move forward for full Agency review. The RAL assigned to this action is Mr. Chris Pfeifer (pfeifer.chris@epa.gov; (703)308-0031). Please contact him if you have any further questions. The PRIA due date for this action is June 26, 2015.

While the screen is not intended to be a full Agency review of the materials submitted, the goal of the initial review is to determine if sufficient information has been presented so that the application can move into the more detailed science review. This process allows the Agency to better utilize its resources on those applications that are ready for review. It is important to note, however, that deficiencies may still be determined upon the completion of the full Agency review.

Regards,
Andrew Bryceland
Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division
USEPA

BPPD New AI/Nonfood-Use
90 Day Technical Screen

Date: 06/24/2014

Review Date: Science Review: 06/18-19/2014 (Russ); Regulatory Review:

File Symbol No.: 89459-RR

Reviewers: Russ (Science); Chris (Regulatory)

BPB/MPB: BPB

Comments: Registrant contacted. They are addressing small deficiencies

Pass/Fail: Pass but minor CSF deficiencies and small missing Phys/chem data

Hours Worked: 3.0 (Science) 1 (Regulatory)

Inert ingredient information may be entitled to confidential treatment

	Checklist Item	Yes	No	N/A	Comments
1.	Forms				
a.	8570-1: Application for Registration				
b.	8570-4: CSF				
c.	8570-27: Formulator's Exemption				
d.	8570-34: Certification with Respect to Data				
e.	8570-35: Data Matrix -Are any of the data that you are citing compensable? Has an Offer To Pay been made? -Is documentation of said offer included in this application (Cite All Method and/or Selective Method)?				
f.	Letter of authorization for consultant representation				
2.	Confidential Statement of Formula (CSF)-review for alternate formulations too				
a.	Signed and dated	X			
b.	All inerts/impurities cleared for nonfood-use				
c.	Does the formulation contain an active ingredient that is not a biochemical (conventional or antimicrobial actives)?		X		
d.	CSF accurately reflects label	X			
e.	Active(s) + Inert(s) = 100%	X			
f.	CAS #s for all inerts/impurities		X		
g.	Chemical names provided for inerts/impurities	X			
h.	Units in all applicable boxes	X			
i.	Proprietary inerts? If so, is info. on file with the Agency?	X			
j.	Supplier information adequately listed	X			
k.	Certified limits correct?		X		Outside range for all three a.i.s
l.	If certified limits are outside recommended range, explanation provided?	X			Necessary because of volatile nature of actives. Explanation in MRID 49375310
m.	Microbial: culture collection reference			X	
n.	Microbial: strain designation for a.i.			X	
o.	Microbial: potency provided with a.i.			X	
p.	Alternate formulations?		X		
q.	Are alternate formulations actually alternate and not a new product?			X	
3.	Data Matrix- TECHNICAL GRADE ACTIVE INGREDIENT (TGAI)				
a.	A separate data matrix for the source of AI is needed when the TGAI is not from a registered source. If a source of the AI is registered no data matrix is required for the TGAI				NA

b.	All product chemistry data requirements addressed (all impurities over 0.1% must be identified and it must be stated that they are not of toxicological concern) (guideline by guideline; Refer to 158.2030).				
c.	All toxicology data requirements addressed (guideline by guideline Refer to 158.2050).				
d.	All nontarget toxicology data requirements addressed (guideline by guideline; Refer to 158.2060).				
e.	Rationales- to satisfy a data requirement with a rationale from the open scientific literature and not a generated study, you must indicate this on the data matrix.				
f.	Reflects info. reported on CSF (e.g.: identity of AI)				
Note for 3b.-d. above: if not addressed in data matrix, may be addressed in elsewhere in submission					
4.	Data Matrix-Manufacturing Use Product (MP) or End Use Product (EP)				
a.	Separate data matrix for the product -If the study(ies) listed states "conditionally required" (CR), read the data table's footnotes to determine if is required.				
b.	All product chemistry/product analysis data requirements addressed (guideline by guideline; Refer to 158.2030)				
c.	All human health toxicology/ pathogenicity data requirements addressed (guideline by guideline; Refer to 158.2050).				
d.	All nontarget toxicology/ pathogenicity data requirements addressed (guideline by guideline; Refer to 158.2060)				
e.	Efficacy data (if public health pests on label) Efficacy data must be submitted and included on the data matrix for the EP if claims are being made for public health pests on the product's label.				
f.	HSRB review required?				
5.	Data Requirements-Guideline Studies (for AI and EP or MP)				
Note: This section is for submitted guideline studies only. See below for waivers and rationales.					
a.	Product chemistry: do all submitted studies appear to satisfy the data requirements(all impurities over 0.1% must be identified and it must be stated that they are not of toxicological concern)? (Refer to 158.2030) Some of the common examples of deficiencies which prevent the submission form being forwarded for review are: -Product chemistry data requirement is was not addressed. -Submitted product chemistry data does not adequately address the data requirement. -CSF not correctly filled out or is missing information -Information on CSF does not match product chem data.	x			Minor CSF deficiencies above. Note: No impurities listed MRID 49375302 Phys/Chem Properties (1) <u>Indole UV/Vis</u> values are not given (p. 6) (2) <u>Trimethylamine Odor</u> not specified (p. 7); (3) <u>Trimethylamine UV/Vis</u> values are not (p. 7) (4) <u>Putrescent egg solids</u> , needs value for <u>Melting point</u> , not MRID citation. (5) <u>Putrescent egg solids</u> , needs value for <u>Partiion Coeff</u> , not MRID citation. Storage stability & Corrosion Characteristics studies for TGAs and EPs are in progress

b.	<p>Toxicology: do all submitted studies appear to satisfy the data requirements? (Refer to 158.2050)</p> <p>Some of the common examples of deficiencies which prevent the submission form being forwarded for review are:</p> <ul style="list-style-type: none"> -Data requirement was not addressed. -Inadequate argument for bridging data to pending product. -Inadequate rationale submitted to address the requirement. 			X	No studies, rationales submitted
c.	<p>Nontargets: do all the submitted studies appear to satisfy the data requirements? (Refer to 158.2060)</p> <p>Some of the common examples of deficiencies which prevent the submission form being forwarded for review are:</p> <ul style="list-style-type: none"> -Data requirement s was not addressed. -Inadequate argument for bridging data to the product. -Inadequate rationale submitted to address the requirement. 			X	No studies, rationales submitted
d.	<p>Other (residue data, special studies, etc.)</p> <p>If your product is labeled for public health pests (PR Notice 2002-1) product performance (efficacy) data requirements must be addressed and submitted. (158.2070)</p>			X	
6.	Data Requirements- Waivers (for AI and EP or MP)				
Note: This section is for waivers only. This does not apply to rationale submitted to satisfy the data requirements.					
a.	<p>Are you requesting that you be waived (exempt/excused) from conducting any of the required studies for product chemistry, human health assessment or non-target organisms?</p> <p>If so, have you indicated such with a valid satisfactory reason as to why you should be excused from conducting this study or studies? A common example which prevents the submission from being forwarded for review for is that an inadequate reason for the waiver request.</p>			X	
b.	<p>For each applicable data requirement, does the waiver request have a separate scientific rationale justifying why testing is not applicable and does this rationale appear to be valid enough such that the package can be forwarded for review?</p>			X	
c.	<p>Does each waiver request seem reasonable and justified?</p> <p>Some common examples which prevent the submission form being forwarded for review for :</p> <ul style="list-style-type: none"> -The reason for the waiver request is inadequate. -The product and/or a.i is 25(b) or GRAS. -The applicant indicated data were waived in the past but no record could be found or past data waiver is not appropriate to the pending product pending product (ex: formulation (solid, gas, liquid) use site, target pest, etc.) 			X	
7.	Data Requirements- Rationales/Literature (for AI and EP or MP)				
Note: This section is for rationales only. This does not apply to requests submitted to waive the data requirements.					
a.	<p>Have rationales been submitted in lieu of guideline studies?</p> <p>Please note.</p>	X			All Tox and Eco data requirements
b..	<p>Does each rationale have scientific literature citations where applicable?</p>	X			
c.	<p>Are the rationale and scientific citations organized in reasonable order to facilitate timely review and is each guideline addressed individually?</p>	X			

d.	<u>Requests to bridge data:</u> TGA: Is the argument for the use of information on a surrogate chemical being made? Has the registrant successfully demonstrated the closeness in relationship? EP: Do the rationales include bridging information on a product formulation very closely related to the pending product formulation? Has the registrant successfully demonstrated the closeness in relationship?		X		
e.	Are copies of cited scientific literature included in the package?	X			Some are previously submitted studies, some are exposure rationales
f.	Does the rationale appear to be reasonable and scientific?	X			
8.	Label				
a.	Restricted Use Pesticide statement (If applicable)			X	
b.	Product name, brand or trademark	X			
c.	Ingredient statement correct? Microbial: strain designation Microbial: potency designation			X	
d.	"Keep Out of Reach of Children" (KOOROC) Statement	X			
e.	Signal word	X			
f.	First aid statement	X			
g.	Net contents/net weight	X			
h.	EPA Reg. No. and Establishment No.	X			
i.	Company name and address	X			
j.	Precautionary statement: hazards to human and domestic animals (Microbial: dusk mask statement)	X			
k.	Environmental hazards	X			
l.	Physical and chemical hazards (if app.)			X	
m.	Directions for use	X			
m.	Storage and disposal	X			
o.	Warranty statement	X			
p.	Worker protection	X			
q.	Batch code			X	

Bryceland, Andrew

Subject: Telecon with Iain to discuss PRIA code with Iain for RF2182 DRY FLY ATTRACTANT [D-491257] (89459-RR)
Location: DCRoomPYS8771/Potomac-Yard-One
Start: Tue 6/17/2014 12:00 PM
End: Tue 6/17/2014 1:00 PM
Show Time As: Tentative
Recurrence: (none)
Meeting Status: Not yet responded
Organizer: Bryceland, Andrew
Required Attendees: Linda Hollis (hollis.linda@epa.gov); Jones, Russell
Resources: DCRoomPYS8771/Potomac-Yard-One

All,

Iain wants to discuss the coding of this application as new a.i. (B600) instead of a B673. The pending product contains trimethylamine hydrochloride on the CSF & label. There are no registered products with this listed as the a.i. that is why it was coded as a new a.i. See Iain's email below for further info and the attached letter.

Andy



TMA-TMAHCI
letter to Linda H...

I am a bit worried about this application which was submitted to EPA on May 2, 2014.
On May 19th

- I received a letter from front end advising me that the action had been coded B600 instead of B676 [Andy had previously called to advise me of this, the issue being that whereas trimethylamine (a gas) is known to the EPA as an active ingredient, trimethylamine hydrochloride (a solid) is not and you reclassified the action.
- I responded to both Andy's call and the front end letter by sending to you (with copies to Russ Jones and Andy Bryceland) a letter as an e-mail attachment and as a signed hard copy throughout the Document Processing Desk which raises questions about the reclassification. A copy of this letter is attached.
- This letter indicated that Central Garden and Pet Company wished to proceed with the application to register their product once the issues relative to trimethylamine and trimethylamine hydrochloride are resolved.
- The front end letter indicated that if the extra payment was not received before June 3 the Agency will reject the application.
- I also called and notified Nicole Berckes of the situation and that Central Pet and Garden would continue with the registration when the active/new active situation was resolved.

The purpose of this letter is to request a status report of a response to the May 19th letter and to reiterate that Central Garden and Pet Company will proceed with the registration application. In my May 19th letter it said that if these issues surrounding the amine and the amine salt could not be resolved to the clients satisfaction through correspondence, a meeting would be requested. This still stands, however I will be out of the country from June 18 until July 3 so perhaps a meeting could be arranged for either July 8 or July 9.

Best regards,

Bryceland, Andrew

From: Iain Weatherston <lweatherston@cox.net>
Sent: Tuesday, June 17, 2014 7:37 PM
To: Bryceland, Andrew
Subject: Updated CSF and Label for RF2182 Attractants product
Attachments: RF2182A Master Label Draft 2013.08.14.docx; New signed CSF RF2182.pdf

Andrew;

Thank you for the meeting this morning and the time that you, Linda and Russ put into resolving the TMA/TMA.HCl conundrum.

I received the PRIA re-classification notice from Mick about 90 minutes after our telephone discussion., also thanks for that since it is now out of the way before I leave tomorrow.

Attached to this e-mail are the amended label, and a new signed CSF. If there are any issues with them, I can address them on my return.

Thanks,

Iain



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 17, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-491257
EPA File Symbol or Registration Number: 89459-RR
Product Name: RF2182 DRY FLY ATTRACTANT
EPA Receipt Date: 05-May-2014
EPA Company Number: 89459
Company Name: CENTRAL GARDEN & PET COMPANY

IAIN WEATHERSTON, Ph.D.
J&T ASSOCIATES LLC
AGENT FOR CENTRAL GARDEN & PET COMPANY
4061 N. 156TH DRVIE
GOODYEAR, AZ 85395

SUBJECT: Recoding of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has recoded your application that is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

This action has been recoded as action code B676:

NEW PRODUCT;MORE THAN ONE ACTIVE INGREDIENT WHERE ONE ACTIVE INGREDIENT IS AN UNREGISTERED SOURCE;PRODUCT CHEMISTRY DATA MUST BE SUBMITTED;REQUIRES 1) SUBMISSION OF PRODUCT SPECIFIC DATA;OR 2) CITATION OF PREVIOUSLY REVIEWED AND ACCEPTED DATA;OR 3) SUBMISSION OR CITATION OF DATA GENERATED AT GOVERNMENT EXPENSE;OR 4) SUBMISSION OR CITATION OF SCIENTIFICALLY-SOUND RATIONALE BASED ON PUBLICLY AVAILABLE LITERATURE OR OTHER RELEVANT INFORMATION THAT ADDRESSES THE DATA REQUIREMENT;OR 5) SUBMISSION OF A REQUEST FOR A DATA REQUIREMENT TO BE WAIVED SUPPORTED BY A SCIENTIFCALLY-SOUND RATIONALE EXPLAINING WHY THE DATA REQUIREMENT DOES NOT APPLY;

No additional payment is due at this time. If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-0152.

Sincerely,

Front End Processing Staff
Information Technology & Resources Management Division

Bryceland, Andrew

From: Iain Weatherston <lweatherston@cox.net>
Sent: Tuesday, June 17, 2014 7:37 PM
To: Bryceland, Andrew
Subject: Updated CSF and Label for RF2182 Attractants product
Attachments: RF2182A Master Label Draft 2013.08.14.docx; New signed CSF RF2182.pdf

Andrew;

Thank you for the meeting this morning and the time that you, Linda and Russ put into resolving the TMA/TMA.HCl conundrum.

I received the PRIA re-classification notice from Mick about 90 minutes after our telephone discussion., also thanks for that since it is now out of the way before I leave tomorrow.

Attached to this e-mail are the amended label, and a new signed CSF. If there are any issues with them, I can address them on my return.

Thanks,

Iain

DATA PACKAGE BEAN SHEET

Date: 29-May-2014

Page 1 of 2

Decision #: 491257

DP #: (420501)

PRIA

Parent DP #:

Submission #: 951816

E-Sub #:

*** Registration Information ***

Registration: 89459-RR - RF2182 DRY FLY ATTRACTANT

Company: 89459 - CENTRAL GARDEN & PET COMPANY

Risk Manager: RM 91 - Andrew Bryceland - (703) 308-6928 Room# PY1 S-8873

Risk Manager Reviewer: Andrew Bryceland ABRYCELA

Sent Date: TENTATIVE Due Date: 26-Jun-2015

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (B600) NEW AI;NON-FOOD USE;MICROBIAL/BIOCHEMICAL;

Ingredients: See page 2

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 29-May-2014

Due Back:

DP Ingredient: See page 2

DP Title:

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: BPPD / BPB

29-May-2014

Last Possible Science Due Date: 27-Apr-2015

Team Name: RM 91

29-May-2014

Science Due Date:

Reviewer Name: Jones, Russell

29-May-2014

Sub Data Package Due Date:

Contractor Name:

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Please perform tech screen. Due back to TL on 8/11/14

Tech screen done

DP#: (420501)

*** Product and Data Package Ingredients ***

Decision#: (491257)

PC Code	CAS	Ingredient Name
103201	27519-02-4	cis-9-Tricosene
105101	51609-52-0	Egg solids
025000	120-72-9	Indole
103201	27519-02-4	cis-9-Tricosene(1%)
105101	51609-52-0	Egg solids(20.5%)
025000	120-72-9	Indole(.2%)

Bryceland, Andrew

From: Bryceland, Andrew
Sent: Thursday, May 29, 2014 8:20 AM
To: Pfeifer, Jay; Jones, Russell
Subject: 89459-RR - technical screen assigned to you
Attachments: biochemical data requirments tables_checklist.docx; 04 09 2014_tech or sim screen deficiency table_attach to checklist.docx

Chris & Russ,

I have assigned a new PRIA action to you for screening. I will place the package on Chris's shelf and transfer the jacket to Chris today. This is due to back to me on Monday August 11th. Please see below for more information and the PRIA dates. Please be sure to fill out the attached files in addition to the checklist.

Also please see Linda's email below regarding the depth needed to do the technical screen.

Andy

89459-RR	RF2182 Dry Fly Attractant	TBD	Decis#: 491257	5/5/14 pin-punched. 5/15/14 coded. 5/21/14 recvd pkg from front end, partially failed (MRID 493753-04), emailed 11-3 letter on 5/21/14. 5/22/14 recvd correction. 5/22/14 cleared 11-3.
Central Garden & pet comp	a.i. z-9-tricosene; Indole-1- benzole; triethylamine hydrochloride; putressenct egg solids		Subm#: 951816 B600	Checked the ai's when coding. Trimethylamine hydrochloride is not a registered active ingredient. It is a cleared inert ingredient. Did research in OPPIN & chem search with Angela. Double checked with Linda before coding as a B600 instead of B676. The new ai is trimethylamine hydrochloride. 90 day technical screen due date: OPPIN 90-day due date is 8/25/14. Screen due to TL on Monday, August 11 th . Chris and Russ are the screeners. <u>PRIA Phase Dates:</u> FFS Start Date 5/26/14 PRIA DUE DATE: 6/26/15 <u>30 Day Public Comment Period:</u> This is a new a.i. and subject to public participation.

From: Hollis, Linda
Sent: Thursday, April 24, 2014 3:07 PM
To: OPP BPPD BPB
Subject: TECHNICAL SCREENING PROCESS - RAL AND REVIEWER READ

ALL

Recall in our branch meeting a few weeks ago I mentioned that the technical Screening Process has changed. I noticed that we are not adhering to the modifications. Here is how the tech screen process should work for actions subject to a 90 day screen.

Your review time is 75 or 76 days- use it

Upon receipt, you verify with the RAL that all of the contents are there.

As the science reviewer, take the package and work on it as part of your queue. Ideal flex day assignments.

As the reviewer, go beyond checking the box that a study is missing. Rather, for the studies that are present and accounted for, you should be scanning through the document (may have to go to IHAD in cases where the registrant is citing data that they did not submit) to determine if it will pass the muster when put into full review.

This is key for several reasons:

- 1) For those actions with a pria time frame exceeding 7 months, we have been catching little things or big things (glaring) that ultimately should not have been caught in secondary review.
- 2) This creates a problem because at the time your secondary is complete, there is little time left on the clock for the issues to be addressed.
- 3) This is a huge problem for our stakeholders and I am committed to finding a way to provide to them (when we can) early notification of deficiencies.
- 4) It is the expectation that we have shifted the secondary resources to the tech screen and therefore, we should be catching more and conveying less problems upon full review.
- 5) I get it that sometimes, in most cases, you have to go deep into the review to find problems. However, what I am asking is that you dig a little deeper beyond scratching the surface more than what is currently being done. For example, if MRID numbers are provided.....pull the study to see if it passes the muster.
- 6) The screen sheet allows you to provide comments. I am requesting that you provide comments beyond the fact that the data is present.
- 7) Does this seem like a mini pre review? Yes, because it is.....and by design.
- 8) Lastly, please use the template that Andy forwards to you when he assigns the screen.
- 9) Please know that I am very much appreciated of the work that you do. I am quite cognizant of the limited resources and mounting work and am trying to find ways to push the work up front so as to free up time in the end.

Feel free to provide any suggestions for improvement to this process. One way may be to revise the screen sheet by attaching the data requirements per 40 CFR. I suggest this because we had a 75 day letter to go out recently that was screened under PRIA 3. Turns out that the deficiencies were 5 batch data; something that ideally should have been determined in a screen.

Thank you,

Linda

TRIMETHYLAMINE/TRIMETHYLAMINE HYDROCHLORIDE [June 17, 2014]

1. Using trimethylamine in the attractant mixture would lead to a PRIA category of B676 and a fee of \$8,683 which was paid.
2. TMA.HCl is a new active which would change the category to B600 which has a fee of \$18,234.
3. Both PRIA action categories have a review time of 13 months.
4. Front End Screen indicates that CG&PC has an unused payment of \$ 3,617 (April 24, 2013) so they are asking us to remit either \$9,551 or \$ 5,934 to continue the action as B600.
5. While we are aware and agree that in the attractant mixture the material that emanates from the trap is trimethylamine, since this is a gas, the precursor trimethylamine hydrochloride is used in the formulation. To make the CSF accurate this is why it contains TMA.HCl.
6. The European Food Safety Authority in the conclusion of review of a risk assessment of TMA.HCl stated "it should be noted that trimethylaminehydrochloride can be considered a variant of trimethylamine." (published January 11, 2012.
7. I believe that the TMA/TMA.HCl issue can be resolved and the category remain B676 by the following changes:

(A) To the label

Change the active ingredient statement to

Z-9-Tricosene	1.00%
Putrescent whole egg solids	20.50%
Trimethylamine	0.60% *
Indole	0.20%
Other ingredients	77.70%

(B) To the CSF

- (i) No changes because the double asterisk (**) in column 13b of the third line leads to the explanation in the next page of the CSF that 1.00% TMA.HCl generates 0.06% of trimethylamine gas which is the actual attractant component.
- (ii) Change line 3, column 10 to read
Trimethylamine CAS#
Generated *in situ* from trimethylamine hydrochloride.

8. In the toxicology, Non-target organisms volume (4) Maija wrote the waivers for trimethylamine.
9. Any other items

21-Day Screen Completed by
Contractor

21-Day Expires on 5-26-14

Jacket # 89459-RR

MRID# 493753

Content Screen: Recommend to Pass/Fail

11-3 Review: Pass/Fail/NA

Overall Status: Recommend to Pass/Fail

Passed
corrected
MRID
ACB
5/22/14

Transfer This Jacket to:

ANDREW BRYCELAND

FPPD Old Active Ingredient Checklist
New Product Registration/Existing Product Amendment

Fast Track ☐ PRIA Actions B650 ☐ , B660 ☐ , B676 ☒ , B680 ☐ , B710 ☐ , B720 ☐ , B730 ☐ , B880 ☐ & B900 ☐
EPA Reg. No.: 89459-RR (11) **RAL: Chris Pfeifer** **Application Date: 5/26/14**

1.	Application Form (EPA Form 8570-1) - signed & complete including package type? IF NO, STOP! Call applicant and have them correct application and resubmit.	√	
2.	If amendment, was final printed labeling received for previous action? IF NO, STOP! E-mail applicant and request final printed labeling. NA <input checked="" type="checkbox"/> Not an Amendment		
3.	Confidential Statement of Formula (CSF) EPA Form 8570-4 Basic Formula <input checked="" type="checkbox"/> Alternate Formula(s) <input type="checkbox"/> Comments: No		
a.	CSF Review completed? IF YES, SKIP to ITEM 4.	√	
b.	CSF is signed and dated? IF NO, CALL APPLICANT.	√	
c.	Completely filled out: CAS numbers, pH, flashpoint, flammability, if applicable?	√	
d.	Are the totals accurate?	√	
e.	Certified limits agree with 40 CFR 158.175? Note that if preliminary or 5 batch analysis differ from Section 158.175(b), limits based on batch analysis would need to be proposed under Section 158.175(c).	√	
f.	Viability (if live microbial, i.e., cfu/gram)? NA <input checked="" type="checkbox"/> Not a Microbe		
g.	PC codes assigned on CSF for actives & inerts plus 40 CFR 180.910, 180.920, and 180.930 codes noted for products that have food or feed uses?	√	
h.	List 1 inert ingredient(s) present in the formulation? If YES, be sure it is listed on the label.		√
i.	Alternate formula(s) do not require different labeling from basic CSF or other alternate CSFs per 40 CFR 152.43(b)(3). NA <input checked="" type="checkbox"/> No Alternates		
j.	Source for a.i. is a registered pesticide? (When a proposed alternate or new basic formula involves a new registered manufacturing-use product as the active ingredient source it must be determined whether the manufacturing-use products used to formulate are similar enough to warrant use of existing product specific data such as acute toxicity.) Comments: 3 ais – 1 is registered, 2 are integrated.	√	
k.	Does CSF list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacea, or wheat commodities? IF YES , RAL must evaluate label directions for compliance with 40 CFR 180.1071.	√	
4.	Data and Data Matrix present. (EPA Form 8570-35) Comments: Product is a combination of registered sources (MPs). Formulator's Exemption Applies. Skipped to 5.	√	
a.	a) Using Selective Method? [IF NO, SKIP to item 5 and note that data matrix should be used for the cite-all method to indicate the companies to whom offers of compensation were made.]	√	
b.	Complete Data Matrix supporting both the product registration and, if applicable, the proposed amendment. Minimum Data Matrix for registration includes: product specific acute toxicity, product chemistry, and efficacy data for public health pests claimed on label.	√	
c.	Adequate product specific data submitted?	√	
d.	Registered source used for active ingredient? IF YES, SKIP to ITEM 5. (If active ingredient is from a registered source (manufacturing-use product), generic data should be satisfied by registered source.) IF NO or if use not supported by registered source , generic data is necessary.	√*	
e.	Data passed PR Notice 86-5 for formatting and MRID number assignment?	√	
f.	Public copy of Data Matrix provided? (PRN 98-5)	√	
5.	Certification with Respect to Citation of Data (EPA Form 8570-34): See 40 CFR 152.80-98 and PR Notice 98-5 [Note: If no data are required or submitted, form is not needed.] Comments: Formulators for ais and OWN data for Chem		
a.	Did applicant check a Method of Support?	√	
b.	General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?	√	
c.	Is the form signed and dated?	√	
d.	Check form and Data Matrix; are Exclusive Use data cited from other sources?		√
e.	IF YES , is the required authorization letter included in application? NA <input checked="" type="checkbox"/>		
6.	Formulators Exemption (EPA Form 5870-27)		
a.	If registrant is using a registered source active ingredient in the formulation (manufacturing-use product), is form filled out completely and signed? NA <input type="checkbox"/>	√	

7.	Exclusive Use Notice Requirement Prior to Registration (Required per 40 CFR 152.116, separate from permission of an exclusive use data submitter to rely on exclusive use data) Is this an exclusive use active ingredient or mix of active ingredients (registered w/in last 10 yrs)? If YES, go to a) or b) below.		√
a.	a) Has a notification of intent to register letter or email been sent to the exclusive use data submitter(s) at least 30 days before registration? (This notification is required for all methods of data support except when the exclusive use data submitter(s)' product is used to formulate and the formulator's exemption is claimed.) NA <input checked="" type="checkbox"/> There are no exclusive use submitters.		
b.	Has exclusive use data submitter requested during 30 day period the applicants' list of data requirements and method of compliance?		√
c.	Has registrant submitted certification from exclusive use data submitter that submitter is aware of the application and does not object to the registration?		√
8.	Science Review completed? Comments: Initially failed Screen because of some minor phys chem deficiencies. Easily resolved. No issues remain.	√	
9.	Label(s) Review Date of Label Review: 5/27/15		
a.	Label(s) in conformance with current <i>Label Review Manual</i> and appropriate REDS.	√	
b.	Labeling statements and claims are supported by Acute Toxicity, Product Chemistry data (or acceptable waivers). Acceptable efficacy studies support public health pests claimed on label.	√	
c.	Nominal concentration of active ingredient shown in ingredients statement.	√	
d.	Viability included as substatement of Ingredient Statement (if microbe, i.e. cfu/gram). NA <input checked="" type="checkbox"/> Not a Microbe.		
e.	Storage and disposal instructions agree with container types listed on application form.	√	
f.	Unique Product Name for Same Company (Check OPPIN).	√	
g.	Does CSF list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacea, or wheat commodities? If YES , RAL must evaluate label use directions for compliance with 40 CFR 180.1071.	√	
h.	Does label bear "National Organic Program"(PR Notice 2003-1) or OMRI claims? If YES, National Organic Program or OMRI claims approved by Chris Pfeifer? NA <input checked="" type="checkbox"/> No Claim		√
i.	Labeling is acceptable. Corrections or changes are NOT necessary.	√	
j.	Comments: Label reflects other trap labels.	√	

Bryceland, Andrew

From: Bryceland, Andrew
Sent: Wednesday, May 21, 2014 7:52 AM
To: Hollis, Linda
Subject: RE: re: File symbol # 89459-RR_lain's letter

Linda,

We discussed this prior to coding. The pending product contains Trimethylamine Hydrochloride as an a.i. This is not an a.i. in any registered product. So we coded as a B600 (product is a fly trap). I called Iain informing him of this. They want a B676 code when they came in. Iain sent a letter yesterday contesting the PRIA code. He either wants written correspondence or a face-to-face meeting if it can't be resolved. The registrant is Central Garden and Pet (Steve Spaulding).

According to his 5/19/14 letter. Trimethylamine is the attractant. Trimethylamine is a gas and "so it is inconceivable how any company can manufacture a solid or granular product containing such a gas." He indicates that they are using trimethylamine hydrochloride to formulate the product "and then under conditions of use when the attractant mixture is added to water in the trap the salt hydrolyses slowly releasing the gas – a component attractive to flies."

In his interpretation of the regulations, "the CSF is a listing of the actual materials used to produce the product which is packaged and sold, and this was done since the hydrochloride salt of trimethylamine is the material that ends up in in the water soluble sachet which are sold to the public."

He also indicates in his letter that there is a double asterisk (**) in Box 13b. According to him it is explained on as "1% TMA.HCL will generate 0.60% trimethylamine gas which is the actual attractant."

Basically he is saying the a.i. is actually trimethylamine and not trimethylamine hydrochloride.

He believe that this can be rectified and a PRIA code of B676 instead of B600 by amending the ingredient statement on the product label by indicating:

"Trimethylamine.....0.6%*

*Trimethylamine generated from 1% trimethylamine hydrochloride"

It is up to you how you want to proceed. I think his argument makes sense to me.

Andy

From: Hollis, Linda
Sent: Wednesday, May 21, 2014 6:47 AM
To: Bryceland, Andrew
Subject: Re: re: File symbol # 89459-RR

Didn't we already dicuss this one?

From: Bryceland, Andrew
Sent: Wednesday, May 21, 2014 6:13:23 AM
To: Hollis, Linda
Subject: FW: re: File symbol # 89459-RR

Linda,

Please see Nicole's email below. Iain emailed this letter on 5/19/14 to you (attached). Iain called Nicole and she spoke to him. You, Russ and I need to meet about this letter and determine if we want to keep the new a.i. code on the application based on his rationale in the letter.

Andy

From: Berckes, Nicole
Sent: Tuesday, May 20, 2014 4:10 PM
To: Bryceland, Andrew; Yanchulis, Michael
Cc: Hollis, Linda
Subject: re: File symbol # 89459-RR

Hi Andy and Mick,

Yesterday Ian Weatherston left me a message regarding file symbol # 89459-RR. Today I followed up with him via phone.

He has submitted a letter to Linda (cc'd) re: the reclassification of the application. He also noted to me that he is working on correcting the deficiencies, though that it may take more than 14 days.

If correcting the deficiencies takes longer than 14 days, will the application be automatically withdrawn? From what I understand, that is what Ian is trying to prevent from happening: they want to keep the application active though correcting the deficiencies may take longer than 14 days.

Let me know if there is anything else that we should be communicating to Ian. Thanks so much.

Nicole

Nicole Berckes
Communications and Registration Liaison
U.S. Environmental Protection Agency
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs
Phone: (703) 308-0152
Email: berckes.nicole@epa.gov

<http://www.epa.gov/pesticides/biopesticides/>

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

RE: Notification of Non-compliance with Pesticide Registration Notice 11-3

Email Sent Date: 5/21/14
Email: iweatherston@cox.net

Dear Dr. Weatherston,

The Biopesticides and Pollution Prevention Division (BPPD) have received your submission of your product application for RF2182 Dry Fly Attractant (EPA File Symbol 89459-RR. All or some of the data were rejected by our Document Processing Unit because they were not submitted as directed in PR Notice 11-3 and should be reformatted and resubmitted to the Document Processing Unit. A copy of PR Notice 11-3 can be found at our website at: http://www.epa.gov/PR_Notices/pr2011-3.pdf should you need assistance in making the necessary changes.

If you still want to register this product, the application will be kept open for a period of 75 days to give you the opportunity to respond to this memorandum. If you find that you need more time you must request an extension for a reasonable stated period of time. Extension requests must be made immediately to me at bryceland.andrew@epa.gov.

If you do not comply with this procedure by not responding to this letter or requesting an extension of time to resubmit the information, the Agency may administratively withdraw your application from further consideration under the provisions of PR Notice 75-4 of August 27, 1975. Once this is done, you will have to submit a completely new application should you wish to pursue the registration of your product after the application has been withdrawn.

The changes and/or corrections required are outlined in the attached EPA Transmittal Letter. You must contact me by telephone at (703)305-6928 or by email at bryceland.andrew@epa.gov and indicate that you will submit the corrected pages via facsimile to (703)308-7026. Once you have faxed the corrected pages, please follow up with an email or phone call to me indicating that you have done so.

If the changes are excessive, you may wish to courier the documents to our. Once all the changes have been made, your submission will be forwarded to our Document Processing Unit for PR Notice 11-3 Screening.

Should you have any additional questions regarding this matter, please feel free to call me.

Sincerely,

Andrew Bryceland

Biopesticides and Pollution
Prevention Division (7511P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 19, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
Or Pay On-Line at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-491257
EPA File Symbol or Registration Number: 89459-RR
Product Name: RF2182 DRY FLY ATTRACTANT
EPA Receipt Date: 05-May-2014
EPA Company Number: 89459
Company Name: CENTRAL GARDEN & PET COMPANY

IAIN WEATHERSTON, Ph.D.
J&T ASSOCIATES LLC
AGENT FOR CENTRAL GARDEN & PET COMPANY
4061 N. 156TH DRIVE
GOODYEAR, AZ 85395

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

This action has been identified as action code B600:
NEW AI;NON-FOOD USE;MICROBIAL/BIOCHEMICAL;

It was coded as a B600 instead of a B676 because trimethylamine hydrochloride is a new **active** ingredient. The fee for action code B600 is \$18,234. Payment has been received in the amount of \$8,683. Also, Central Garden and Pet Company has an unused payment in the amount of \$3,617 that was received on April 24, 2013. Please remit payment in the amount of \$9,551 (or \$5,934 if the unused payment is designated for this action) within 14 days to:

By USPS: U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 979074
St. Louis, MO 63197-9000

By courier: U.S. Bank
Government Lockbox 979074
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63197
Telephone: (314) 425-1818

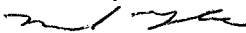
All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

A PRIA decision time review period will not start until the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action within the next 14 days, the Agency will presume that you no longer want to pursue this action. The Agency will then reject your application and issue an invoice for any applicable outstanding fees.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-0152.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division

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PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 5/5/14

Experts In-Processing Signature: MP Date 5/19/14 Fee Paid: Yes

Division management contacted on issues No Yes Date

EPA Reg. Number: <u>89459-AR</u>		EPA Receipt Date: <u>5/5/14</u>				
Items for Review			Yes	No	N/A*	
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
		X				
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5				X	
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
10	<u>Required Data</u> and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

- Studies previously submitted FAILED PRN 11-3 Review
 - failed MRID: 49375304
 - no longer in possession of studies to get corrections
- Inerts approved for non-food use
- Jacket FAILED

CR

MRID: 493753

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the [inert Web site](#) and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the [Chief of Microbial Pesticides Branch](#).

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Fee for Service

¹⁶
{9518163~

This package includes the following

☒ New Registration

☐ Amendment

☒ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☒ BPPD

☐ RD

Risk Mgr.

91

Receipt No.

S-

951816

EPA File Symbol/Reg. No.

89459-RR

Pin-Punch Date:

5/5/2014

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

B676

Granted:

B600

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Andrew Bryceland

Date: 5/15/14

Remarks:

Trimethylanone hydrochloride is a new ~~at~~ active ingredient



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 15, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

J & T Associates, LLC
CENTRAL GARDEN & PET COMPANY
1501 EAST WOODFIELD ROAD, SUITE 200 WEST
SCHAUMBURG, IL 60173

*corrected 5/22/14
Peresa Down*

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 05-MAY-14. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 11-03, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents.

If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below.

These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels.

The rejected studies and their deficiencies are described below.

49375304

* FIFRA Section 10(d)(1) only provides for confidentiality of information which: (A) discloses

manufacturing or quality control processes, (B) discloses the details of any methods for testing, detecting, or measuring the quantity of any deliberately added inert ingredient of a pesticide, or (C) discloses the identity or percentage quantity of any deliberately added inert ingredient of a pesticide... Since your claim covers information entirely outside this narrow range of subject matter, it cannot be accepted.

Receipt for Section 3

S: 951816

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: New Registration

Fee For Service: ☒ Yes ☐ No

Billable: ☒ Yes ☐ No

Company: 89459 CENTRAL GARDEN & PET COMPANY



Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 89459-RR Product Name: RF2182 DRY FLY ATTRACTANT

Override#:

Me Too

Me Too Product

Section3:

Name:

Application Date: 27-Jan-2014

OPP Rec'd Date: 05-May-2014

Front End Date: 06-May-2014

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Application for new product registration

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Study

CSF

View/Edit

Receipt for Section 3

S: 951816

Milestone Email:

Regulatory Type: Product Registration - Section 3

Print Letter

Application Type: New Registration

Fee For Service: ☒ Yes ☐ No

Enter More Information

Billable: ☒ Yes ☐ No

Tracking

Company: 89459 CENTRAL GARDEN & PET COMPANY

V

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 89459-RR Product Name: RF2182 DRY FLY ATTRACTANT

Me Too
Section3:

Me Too Product
Name:

Application Date: 27-Jan-2014 ☒ OPP Rec'd Date: 05-May-2014 ☒

Front End Date: 06-May-2014 ☒ Risk Manager Send Date: ☒

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Receipt Content

Study

CSF

New Ingredient:

View/Edit

Receipt Description:

Application for new product registration

J&T Associates LLC

Iain Weatherston Ph.D.

Director

623-217-9013 / 623-535-4055

E-mail: iweatherston@cox.net

January 17, 2014

Ms. Linda Hollis,
 Chief, Biochemical Pesticides Branch
 U.S. EPA – OCSP – OPP – BPPD – PM #91 (7504P)
 One Potomac Yard,
 2777 South Crystal Drive
 Arlington VA 22202-4501

SUBJECT: Application to register RF2182 DRY FLY ATTRACTANT

COMPANY: Central Garden & Pet Company, 1501 East Woodfield Road,
 Suite 200, Schaumburg, IL 60173.

CONTACT: Iain Weatherston, Ph.D., J&T Associates LLC, 4061 N. 156th
 Drive, Goodyear, AZ 85395.

PRIA Category B676

PRODUCT: RF2182 DRY FLY ATTRACTANT

Dear Ms. Hollis:

As consult to, and on behalf of Central Garden & Pet Company, I submit for your review and approval this application to register RF2182 DRY FLY ATTRACTANT. This biochemical attractant end-use product will be used in conjunction with various traps to control house flies and other filth flies in and around stables, commercial dairies, feedlots and other farm areas.

RF2182 DRY FLY ATTRACTANT is formulated [REDACTED] Z-9-tricosene with indole, trimethylamine (from the hydrochloride) and putrescent whole egg solids being the other active ingredients used to attract the target pests into a trap. RF2182 DRY FLY ATTRACTANT is a granular solid product which is packaged in water soluble pouches.

In addition to this letter the Administrative Volume 89459-?-1 contains:

- A fully executed pesticide application form 8570-1
- A PRIA fee payment confirmation from pay.gov
- A copy of the letter of Agency
- A fully executed Formulator's Exemption Statement 8570-27
- A fully executed certification with respect to data citation form 8570-34
- Data matrices for indole, trimethylamine (from trimethylamine hydrochloride) and putrescent whole egg solids and RF2182 DRY FLY ATTRACTANT
- Draft master label (one copy bound into this volume and a copy on CD-ROM)
- Confidential Statement of Formula 8570-4 and accompanying notes.

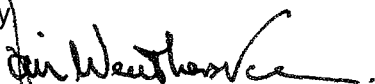
In addition to the Administrative volume, the submission consists of the following volumes:-

Product ingredient source information may be entitled to confidential treatment

VOLUME 89459-?-2	Product Chemistry of Indole, Trimethylamine, and Putrescent Whole Egg Solids, the Active Ingredients of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-3	Product Chemistry of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-3S	Product Chemistry of RF2182 DRY FLY ATTRACTANT Density of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-3S-1	Product Chemistry of RF2182 DRY FLY ATTRACTANT Enforcement Analytical Method.
VOLUME 89459-?-4	Toxicology, Non-Target Organisms and Environmental Fate of Indole, Trimethylamine and Putrescent Egg Solids, Active Ingredients of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-5	Request for Waivers of Specific Data Requirements Toxicology of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-6	Request for Waivers of Specific Data Requirements Product Performance: Field Efficacy of RF2182 in Fly Relief Traps.
VOLUME 89459-?-7	Product Performance: Field Efficacy of RF2182 in Trap 'N' Toss Traps.
VOLUME 89459-?-8	Product Performance: Field Efficacy of RF2182 in Captivator Traps.
VOLUME 89459-?-9	Product Performance: Field Efficacy of RF2182 in Terminator Pro Traps.

If there are any questions or you require further information please do not hesitate to contact me at iweatherston@cox.net or by phone at 623-535-4055.

Sincerely,



Iain Weatherston
Agent to Central Garden and Pet Company.

TRANSMITTAL DOCUMENT

NAME & ADDRESS OF APPLICANT

Central Garden and Pet Company
1501 East Woodfield Road, Suite 200.
Schaumburg, IL 60173

REGULATORY ACTION IN SUPPORT OF WHICH THIS PACKAGE IS SUBMITTED APPLICATION TO REGISTER RF2182 DRY FLY ATTRACTANT

TRANSMITTAL DATE

~~January~~ MAY 2, 2014.

LIST OF SUBMITTED MATERIAL

VOLUME 89459-?-1	Administrative Materials: Correspondence, Application, Forms, Label and Confidential Statement of Formula.
VOLUME 89459-?-2	Product Chemistry of Indole, Trimethylamine, and Putrescent Whole Egg Solids, the Active Ingredients of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-3	Product Chemistry of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-3S	Product Chemistry of RF2182 DRY FLY ATTRACTANT
VOLUME 89459-?-3S-1	Density of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-4	Product Chemistry of RF2182 DRY FLY ATTRACTANT
VOLUME 89459-?-4	Enforcement Analytical Method.
VOLUME 89459-?-5	Toxicology, Non-Target Organisms and Environmental Fate of Indole, Trimethylamine and Putrescent Egg Solids, Active Ingredients of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-6	Request for Waivers of Specific Data Requirements
VOLUME 89459-?-7	Toxicology of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-8	Request for Waivers of Specific Data Requirements
VOLUME 89459-?-9	Product Performance: Field Efficacy of RF2182 in Fly Relief Traps.
VOLUME 89459-?-9	Product Performance: Field Efficacy of RF2182 in Trap 'N' Toss Traps.
VOLUME 89459-?-9	Product Performance: Field Efficacy of RF2182 in Captivator Traps.
VOLUME 89459-?-9	Product Performance: Field Efficacy of RF2182 in Terminator Pro Traps.

PRIA INFORMATION

PRIA Category:	B676
Pay.gov Tracking ID:	25DJ34B8
Agency Tracking ID:	74544419177

COMPANY AGENT/CONTACT


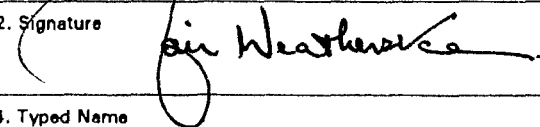
Iain Weatherston, Ph.D.
J&T Associates LLC.
4061 North 156th Drive,
Goodyear, AZ 85395
(623)-535-4055 /iweatherston@cox.net

AGENT SIGNATURE: _____




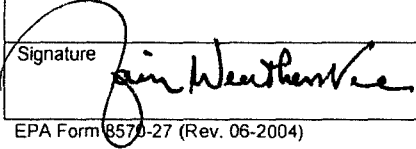

DATE: 05/02/2014

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95

		United States Environmental Protection Agency Washington, DC 20460		<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I					
1. Company/Product Number 89459-?		2. EPA Product Manager Linda Hollis		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) Central Garden & Pet Co. / RF2182 Dry Fly Attractant		PM# 1#99 (BPPD)			
5. Name and Address of Applicant (Include ZIP Code) Central Garden & Pet Company, 1501 East Woodland Road, Suite 200, Schaumburg, IL 60173 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____			
Section - II					
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.					
Explanation: Use additional page(s) if necessary. (For section I and Section II.) PRIA B676					
Section - III					
1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) PVA film		
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 15 and 30 grams		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product Affixed to trap/reduced verbiage on PVA pouch <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					
Section - IV					
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name IAIN WEATHERSTON		Title Agent to Central Garden and Pet Company		Telephone No. (Include Area Code) 623-535-4060	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					8. Date Application Received (Stamped)
2. Signature 		3. Title Agent to Central Garden and Pet Company			
4. Typed Name IAIN WEATHERSTON		5. Date January 14, 2014			


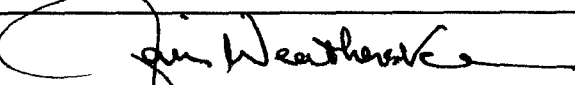
Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.

 <div>United States Environmental Protection Agency Washington, DC 20460 Formulator's Exemption Statement (40 CFR 152.85)</div>		
Applicant's Name and Address Central Garden and Pet Company, 1501 East Woodfield Road, Suite 200 SCHAUMBURG, IL 60173	EPA File Symbol/Registration Number 89459-?	
	Product Name RF2182 Dry Fly Attractant	
	Date of Confidential Statement of Formula (EPA Form 8570-4) 01/13/2014	
As an authorized representative of the applicant for registration of the product identified above, I certify that:		
(1) This product contains the following active ingredient(s): Cis -9- Tricosene		
(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).		
(3) Indicate by checking (A) or (B) below which paragraph applies:		
<input checked="" type="checkbox"/> (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).		
OR		
<input type="checkbox"/> (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.		
(4) The following active ingredients in this product qualify for the formulator's exemption.		
Source		
Active Ingredient Z-9-Tricosene	Product Name 	Registration Number 
Product ingredient source information may be entitled to confidential treatment		
Signature 	Name and Title Iain Weatherston/Agent to Central 	Date 01/13/2014

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy

Form Approved OMB Nos. 2070-0060; 2070-0057; 2070-0107; 2070-0122; 2070-0164

 <p align="center">UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460</p>		
<p>Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.</p>		
<p align="center">Certification with Respect to Citation of Data</p>		
<p>Applicant's/Registrant's Name, Address, and Telephone Number Central Garden and Pet Co. 1501 East Woodfield Road, Suite 200, Schaumburg IL (623-535-4055)</p>		<p>EPA Registration Number/File Symbol 89459-2</p>
<p>Active Ingredient(s) and/or representative test compound(s) Indole, Egg Solids, Trimethylamine (as hydrochloride) and Z-9-tricosene</p>		<p>Date January 13, 2014</p>
<p>General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Outdoor, Non Food</p>		<p>Product Name FR 2182 DRY FLY ATTRACTANT</p>
<p>NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).</p>		
<p><input type="checkbox"/> I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).</p>		
<p align="center">SECTION I: METHOD OF DATA SUPPORT (Check one method only)</p>		
<p><input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).</p>		<p><input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).</p>
<p align="center">SECTION II: GENERAL OFFER TO PAY</p>		
<p>[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]</p> <p><input checked="" type="checkbox"/> I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.</p>		
<p align="center">SECTION III: CERTIFICATION</p>		
<p>I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.</p> <p>I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.</p> <p>I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.</p> <p>I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.</p> <p>I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>		
<p>Signature </p>	<p>Date Jan. 13, 2014</p>	<p>Typed or Printed Name and Title Iain Weatherston, Agent to Central Garden & Pet</p>

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 1/13/2014		EPA Reg No./File Symbol 89459-?		Page 1 of 2	
Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
Ingredient Indole					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
880.1550	Product identity and composition	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
880.1200	Starting materials and production process	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
880.1400	Discussion of the formation of impurities	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
830.1700	Preliminary analysis	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
830.1750	Certified Limits	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
830.1800	Enforcement analytical method	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
830. 6000/7000	Physical/chemical characteristics as required	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
870.1100	Acute oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.1200	Acute dermal toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.1300	Acute inhalation toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.2400	Acute eye irritation	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.2500	Acute dermal irritation	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.2600	Skin sensitization	this application	Central Garden and Pet CompanyCentral Gard	Own	Vol 89459-?-4
	Hypersensitivity incidents	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.3100	90-day oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
Signature <i>Iain Weatherston</i>			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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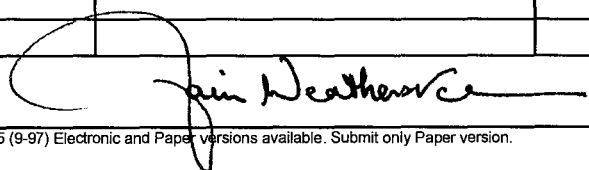


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DATA MATRIX

Date 1/13/2014		EPA Reg No./File Symbol 89459-?		Page 2 of 2	
Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
Ingredient Indole					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3250	90-Day dermal toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.3465	90-Day inhalation toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.3700	Prenatal development	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.5100	Bacterial reverse mutation test	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.5300	In vitro Mammalian cell assay	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.2100	Avian acute oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.2200	Avian dietary toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.1075	Fish acute toxicity (freshwater)	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.1010	Aquatic invertebrate acute toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.4100	Terrestrial plant toxicity (seedling emergence)	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.4150	Terrestrial plant toxicity (vegetative vigor)	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
880.4350	Non target insect testing	this application	Central Garden and Pet Company	Own	Vol 89459-?-4 *
	* see also Vols 89459-?-6, 89459-?-7, 89459-?-8 and	89459-?-9			
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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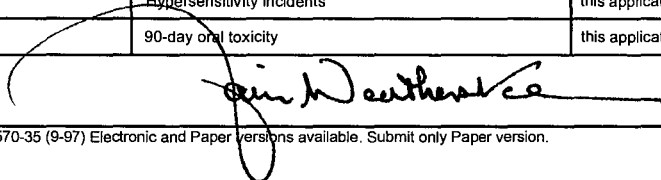


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Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
Ingredient Trimethylamine from (trimethylamine hydrochloride)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
880.1550	Product identity and composition	this application	Central Garden and Pet Company	Own	Vol 89459-7-2
880.1200	Starting materials and production process	this application	Central Garden and Pet Company	Own	Vol 89459-7-2
880.1400	Discussion of the formation of impurities	this application	Central Garden and Pet Company	Own	Vol 89459-7-2
830.1700	Preliminary analysis	this application	Central Garden and Pet Company	Own	Vol 89459-7-2
830.1750	Certified Limits	this application	Central Garden and Pet Company	Own	Vol 89459-7-2
830.1800	Enforcement analytical method	this application	Central Garden and Pet Company	Own	Vol 89459-7-2
830.6000/7000	Physical/chemical characteristics as required	this application	Central Garden and Pet Company	Own	Vol 89459-7-2
870.1100	Acute oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-7-4
870.1200	Acute dermal toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-7-4
870.1300	Acute inhalation toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-7-4
870.2400	Acute eye irritation	this application	Central Garden and Pet Company	Own	Vol 89459-7-4
870.2500	Acute dermal irritation	this application	Central Garden and Pet Company	Own	Vol 89459-7-4
870.2600	Skin sensitization	this application	Central Garden and Pet CompanyCentral Gard	Own	Vol 89459-7-4
	Hypersensitivity incidents	this application	Central Garden and Pet Company	Own	Vol 89459-7-4
870.3100	90-day oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-7-4
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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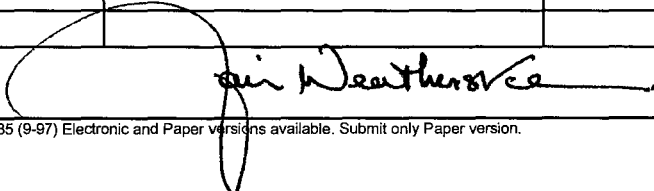


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Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
Ingredient Trimethylamine (from trimethylamine hydrochloride)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3250	90-Day dermal toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.3465	90-Day inhalation toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.3700	Prenatal development	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.5100	Bacterial reverse mutation test	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.5300	In vitro Mammalian cell assay	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.2100	Avian acute oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.2200	Avian dietary toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.1075	Fish acute toxicity (freshwater)	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.1010	Aquatic invertebrate acute toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.4100	Terrestrial plant toxicity (seedling emergence)	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.4150	Terrestrial plant toxicity (vegetative vigor)	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
880.4350	Non target insect testing	this application	Central Garden and Pet Company	Own	Vol 89459-?-4 *
	* see also Vols 89459-?-6, 89459-?-7, 89459-?-8 and	89459-?-9			
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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Date 1/13/2014		EPA Reg No./File Symbol 89459-?		Page 1 of 2	
Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
Ingredient Putrescent whole egg solids					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
880.1550	Product identity and composition	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
880.1200	Starting materials and production process	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
880.1400	Discussion of the formation of impurities	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
830.1700	Preliminary analysis	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
830.1750	Certified Limits	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
830.1800	Enforcement analytical method	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
830.6000/7000	Physical/chemical characteristics as required	this application	Central Garden and Pet Company	Own	Vol 89459-?-2
870.1100	Acute oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.1200	Acute dermal toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.1300	Acute inhalation toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.2400	Acute eye irritation	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.2500	Acute dermal irritation	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.2600	Skin sensitization	this application	Central Garden and Pet CompanyCentral Gard	Own	Vol 89459-?-4
	Hypersensitivity incidents	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.3100	90-day oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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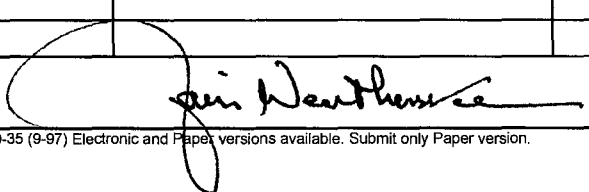


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Date 1/13/2014		EPA Reg No./File Symbol 89459-?		Page 2 of 2	
Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
Ingredient Putrescent whole egg solids					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3250	90-Day dermal toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.3465	90-Day inhalation toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.3700	Prenatal development	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.5100	Bacterial reverse mutation test	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
870.5300	In vitro Mammalian cell assay	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.2100	Avian acute oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.2200	Avian dietary toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.1075	Fish acute toxicity (freshwater)	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.1010	Aquatic invertebrate acute toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.4100	Terrestrial plant toxicity (seedling emergence)	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
850.4150	Terrestrial plant toxicity (vegetative vigor)	this application	Central Garden and Pet Company	Own	Vol 89459-?-4
880.4350	Non target insect testing	this application	Central Garden and Pet Company	Own	Vol 89459-?-4 *
	* see also Vols 89459-?-6, 89459-?-7, 89459-?-8 and	89459-?-9			
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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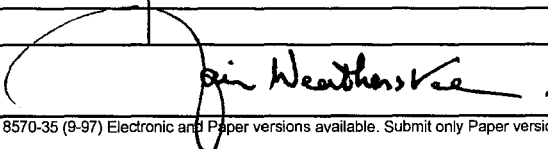
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Date 1/13/2014		EPA Reg No./File Symbol 89459-?		Page 1 of 2	
Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
Ingredient End-use product containing Z-9-tricosene, indole, trimethylamine (from trimethylamine hydrochloride) and putrescent whole egg solids.					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
880.1100	Product identity and composition	this application	Central Garden and Pet Company	Own	Vol 89459-7-3
880.1200	Description of startmaterials and formulation process	this application	Central Garden and Pet Company	Own	Vol 89459-7-3
880.1400 (870.1670)	Discussion of the formation of impurities	this application	Central Garden and Pet Company	Own	Vol 89459-7-3
830.1750	Certified limits	this application	Central Garden and Pet Company	Own	Vol 89459-7-3
830.1800	Enforcement analytical method	this application	Central Garden and Pet Company	Own	Vol 89459-7-3S-1
830.6000/7000 (as required)					
830.6302	Color	this application	Central Garden and Pet Company	Own	Vol 89459-7-3
830.6303	Physical state	this application	Central Garden and Pet Company	Own	Vol 89459-7-3
830.6304	Odor	this application	Central Garden and Pet Company	Own	Vol 89459-7-3
830.6317	Storage stability		Central Garden and Pet Company		in progress
830.6320	Corrosion characteristics		Central Garden and Pet Company	Ow	in progress
830.7300	Density, specific gravity	this application	Central Garden and Pet Company	Own	Vol 89459-7-3S
All other physical/chemical	characteristics are NOT REQUIRED for an end-use	product which	is solid.		
870.1100	Acute oral toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-7-5
870.1200	Acute dermal toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-7-5
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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Date 1/13/2014		EPA Reg No./File Symbol 89459-?	Page 2 of 2		
Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Schaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
Ingredient End-use product containing Z-9-tricosene, indole, trimethylamine (from trimethylamine hydrochloride) and putrescent whole egg solids.					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1300	Acute inhalation toxicity	this application	Central Garden and Pet Company	Own	Vol 89459-?-5
870.2400	Acute eye irritation	this application	Central Garden and Pet Company	Own	Vol 89459-?-5
870.2500	Acute dermal irritation	this application	Central Garden and Pet Company	Own	Vol 89459-?-5
870.2600	Skin sensitization	this application	Central Garden and Pet Company	Own	Vol 89459-?-5
885.3400	Hypersensitivity incidents	this application	Central Garden and Pet Company	Own	Vol 89459-?-5
810.3200	Product performance	this application	Central Garden and Pet Company	Own	Vol 89459-?-6
	Product performance	this application	Central Garden and Pet Company	Own	Vol 89459-?-7
	Product performance	this application	Central Garden and Pet Company	Own	Vol 89459-?-8
	Product performance	this application	Central Garden and Pet Company	Own	Vol 89459-?-9
Signature 		Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014	

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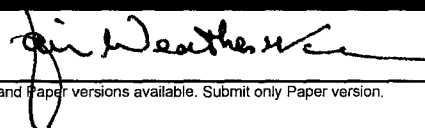


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Date 1/13/2014		EPA Reg No./File Symbol 89459-?		Page 1 of 2	
Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173			Product RF2182 DRY FLY ATTRACTANT		
Ingredient Indole					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
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			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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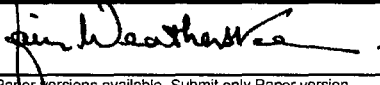


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Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173			Product RF2182 DRY FLY ATTRACTANT		
Ingredient Indole					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
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			Central Garden and Pet Company	Own	
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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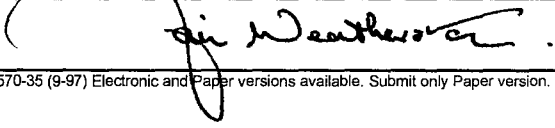


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Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173			Product RF2182 DRY FLY ATTRACTANT		
Ingredient Trimethylamine from (trimethylamine hydrochloride)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
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			Central Garden and Pet Company	Own	
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

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Page 1 of 2

Product	Price	Quantity	Total
Product A	10	100	1000
Product B	20	50	1000
Product C	30	33.33	1000
Product D	40	25	1000
Product E	50	20	1000
Product F	60	16.67	1000
Product G	70	14.29	1000
Product H	80	12.5	1000
Product I	90	11.11	1000
Product J	100	10	1000

RF2182 DRY FLY ATTRACTANT

[illegible]

and Paper versions available. Submit only Paper version.

Iain Weatherston, Agent to Central Garden & Pet Company

01/12/2014



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060


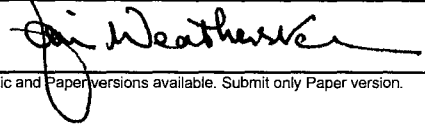
Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 1/13/2014		EPA Reg No./File Symbol 89459-?		Page 1 of 2	
Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Scaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
Ingredient End-use product containing Z-9-tricosene, indole, trimethylamine (from trimethylamine hydrochloride) and putrescent whole egg solids.					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
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			is solid.		
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
Signature	Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014		

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Public File Copy

	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460	Form Approved OMB No. 2070-0060			
<p>Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.</p>					
DATA MATRIX					
Date 1/13/2014		EPA Reg No./File Symbol 89459-?			
Page 2 of 2					
Applicant's/Registrant's Name & Address Central Garden & Pet Company, 1501 East Woodfield Road, Suite 200, Schaumburg IL 60173		Product RF2182 DRY FLY ATTRACTANT			
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			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
			Central Garden and Pet Company	Own	
Signature 			Name and Title Iain Weatherston, Agent to Central Garden & Pet Company		Date 01/12/2014

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Public File Copy

Starbar® Fly Attractant Master Label

Summary of product formats

			Each WS Attractant pouch Net Weight		
			Ounces	Grams	
Bag traps	Disposable, single-use, sealed bag style trap with water soluble (WS) attractant pouch within; consumer cuts open trap top and adds water to activate. EPA label on trap bag, 2 sizes	1 for Large size 2 for giant size	1	30	2-4
Single-Use Jug Traps	Disposable, single-use "inverted cone-style" jug trap sold with WSP attractant packaged in tear-open packet with EPA label on trap and reduced labeling on attractant package	1	0.50	15	5-7
Reusable Jug Traps	Reusable jug trap sold with WSP attractant packaged in tear-open packet with EPA label on trap and reduced labeling on attractant package	1 for ½ gallon jug 2 for gallon jug	1	30	8-11
Fly Attractant WSP Refill packages	Bag of attractant WSP(s). Full EPA label on outside of outer bag. WSP each labeled with reduced wording per PRN 94-8 (II)(4)	2-24	1	30	12-14
Fly attractant WS pouch	Label text for individual water soluble pouch	NA	0.50 - 1	15/30	15

[optional text]

[Label for Bag Traps (2 sizes) - TOP PANEL]

READ DIRECTIONS FOR USE BEFORE OPENING

Cut on dotted line [associated with dotted line graphic]

[Label for Bag Traps, (2 sizes) - FRONT PANEL]

.....WATER FILL LINE.....LÍNEA INDICADORA.....

[Starbar logo][FLY RELIEF™] [Large/Giant size]
[DISPOSABLE FLY BAG TRAP][Atrapador de moscas desechable]
[Add water and hang] [Añada agua y cuelgue]
[Insecticide free] [Libre de insecticida]
[Holds up to 10,000 flies] [Retiene hasta 10,000 moscas] (for large size)
[Holds up to 20,000 flies] [Retiene hasta 20,000 moscas](for giant size)
[Catches filth breeding flies such as house flies, [blow flies,] [flesh flies,] [blue and green bottle flies,] [dump flies,] [and dung flies]]
[Fly Terminator]
[Easy to Use]
[Attractant included]
[Attracts and traps flies]
[Flies drown in attractant]
[No killing agents, insects drown]
[Ideal for areas with heavy fly concentrations]
[Non-toxic]
[For outdoor use]
[Includes proven fly attractant]
[Just add water]

ACTIVE INGREDIENTS:

Z-9 tricosene	1.0%
Putrescent whole egg solids	20.5%
Trimethylamine hydrochloride	1.0%
Indole	0.2%

OTHER INGREDIENTS:	77.3%
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TOTAL	100.0%
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KEEP OUT OF REACH OF CHILDREN
CAUTION

ATTRACTANT NET CONTENTS: 1 oz (30 grams) Trap size: large
2 oz (60 grams) Trap size: Giant

[Label for Bag Traps, (2 sizes) - BACK PANEL]

[Brand Name] includes a scientifically developed attractant. It contains no harmful insecticides making it an ideal alternative. Once flies are in the trap, they drown and add to the trap's attractant. Use [Brand Name][this disposable trap] in the yard, kennel, stable, barn, around horses, pets, cattle, sheep, poultry, hogs, garbage containers and other outdoor areas where nuisance and filth flies are a problem.

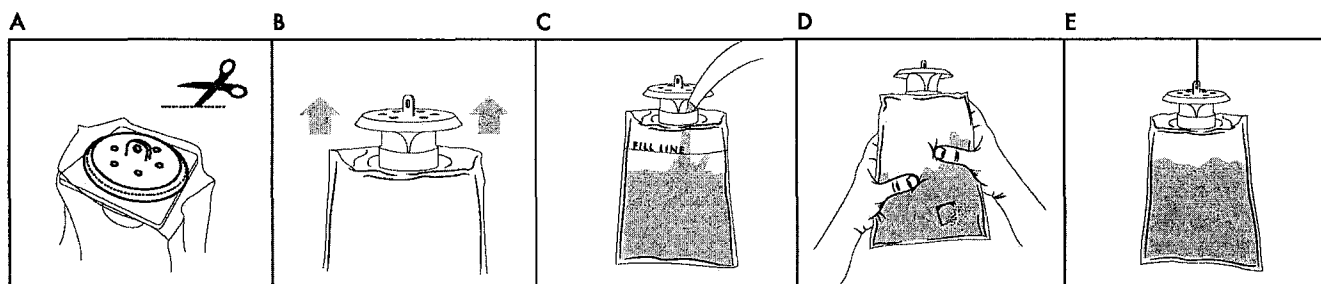
[Catches filth breeding flies such as house flies, [blow flies,] [flesh flies,] [blue and green bottle flies,] [dump flies,] [and dung flies]]

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

1. Remove film on top of trap by cutting dotted line inside of black rim seal. [(Diagram A)]
2. Pull up trap top by tab until it snaps into position. [(Diagram B)]
3. Fill trap to "fill line" with clean water to activate the attractant. [(Diagram C)]
4. Agitate lightly to disperse attractant. [(Diagram D)]
5. Hang trap outside in a sunlit area of high fly concentration when flies are active and where odors will not be a problem. [(Diagram E)] For best results, place trap within four feet of the ground. In hot weather (above 90°F/32°C), place trap in shade for better results, in cooler weather, place trap in sun.
6. For use in yards or around animal housing, place traps 30 ft (10 m) or more away from home or animals to draw flies away from those locations.
7. For high fly populations, use several traps in different locations.
8. Replace trap when full of flies, or when contents dry out.
9. Wash hands with soap and water after handling.

NOTE: Not for indoor use, nor for use against biting flies. Contents may give off bad odor; keep contents from coming into contact with hands or clothing.



STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry, well-ventilated location out of reach of pets and livestock. **CONTAINER**

HANDLING: Push trap top down to close. Deposit in trash.

(Central Garden & Pet confirms that the Spanish language text is/will be a true and accurate translation of the English text.)

For information or in case of emergency, call 1-800-XXX-XXXX or visit our Web site: www.starbarproducts.com

EPA Reg. No. 89459-XX

EPA Est. No.

Central Garden & Pet Company, 1501 East Woodfield Road, 200W, Schaumburg, Illinois 60173

Starbar is a registered trademark of Welmark International, Central Garden & Pet is a trademark of Central Garden & Pet Company. Fly Relief is a trademark of Farnam Companies, Inc. Trademarks are the property of their respective owners.

Made in USA

[Label for Single Use Jug Traps - FRONT PANEL]

.....WATER FILL LINE.....LÍNEA INDICADORA.....

- [Starbar logo] [TRAP 'N TOSS™][MUSCA-DOME]
- [DISPOSABLE FLY TRAP] [Atrapador de moscas desechable]
- [Attractant included!]
- [Hang or set on ground]
- [Insecticide free] [Libre de insecticida]
- [Catches filth breeding flies such as house flies, [blow flies,] [flesh flies,] [blue and green bottle flies,] [dump flies,] [and dung flies]]
- [Fly Terminator]
- [Attracts and traps flies]
- [Flies drown in attractant]
- [No killing agents, insects drown]
- [Easy to Use]
- [Non-toxic]
- [For outdoor use]
- [Includes proven fly attractant]
- [Just add water]

ACTIVE INGREDIENTS:	
Z-9 tricosene	1.0%
Putrescent whole egg solids	20.5%
Trimethylamine hydrochloride	1.0%
Indole	0.2%
OTHER INGREDIENTS:	<u>77.3%</u>
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

ATTRACTANT NET CONTENTS: 0.5 oz (15 grams)

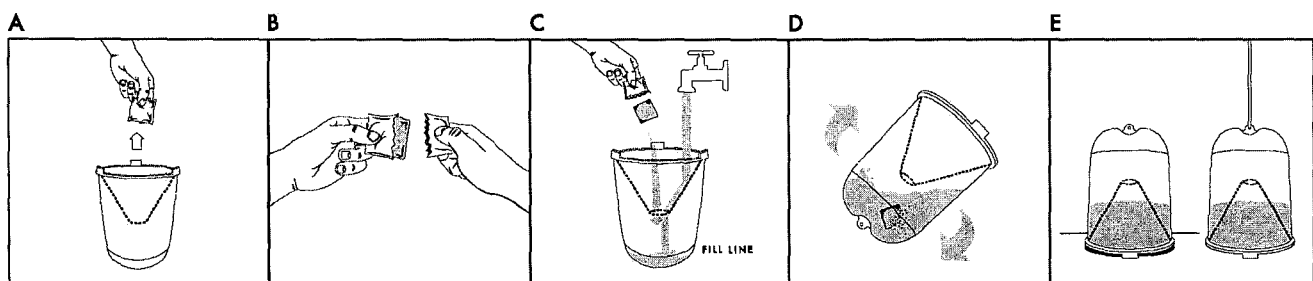
[Label for Single Use Jug Traps - SIDE PANEL(S)]

[Brand Name] Disposable Fly Trap includes a scientifically developed attractant. It contains no harmful insecticides making it an ideal alternative. Once flies are in the trap, they drown and add to the attractant. Use [Brand Name] [this disposable trap] in the yard, kennel, stable, barn, around horses, pets, cattle, sheep, poultry, hogs, garbage containers and other outdoor areas where nuisance and filth flies are a problem. [Catches filth breeding flies such as house flies, [blow flies,] [flesh flies,] [blue and green bottle flies,] [dump flies,] [and dung flies]]

DIRECTIONS FOR USE:

1. Bait and use trap outdoors.
2. Remove attractant assembly from inside of trap cone. [(Diagram A)]
3. While holding trap upside down, tear open outside attractant packet. [(Diagram B)]
4. Drop water-soluble attractant pouch into trap. Handle with dry hands or use gloves. Do not open the inside pouch, it will dissolve in water. Add [16 fluid ounces [fl oz] of] clean water [up to fill line] to activate attractant [(Diagram C)].
5. Agitate lightly to disperse attractant. [(Diagram D)]
6. Slowly turn trap right side up, and hang or set on a flat surface outside in a sunlit area of high fly concentration when flies are active and where odors will not be a problem. [(Diagram E)] For best results, place trap within four feet of the ground. In hot weather (above 90°F/32°C), place trap in shade for better results, in cooler weather, place trap in full sun.
7. If placed on ground, be sure that at least ¼ inch of space is available between the trap body and ground so flies can enter.
8. Replace trap when full of flies, or when trap contents dry out
9. Wash hands with soap and water after handling.

NOTE: Not for indoor use, nor for use against biting flies. Contents may give off bad odor; keep contents from coming in contact with hands or clothing.



STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry, well-ventilated location out of reach of pets and livestock.

CONTAINER HANDLING: Deposit in trash.

(Central Garden & Pet confirms that the Spanish language text is/will be a true and accurate translation of the English text.)

For information or in case of emergency, call 1-800-XXX-XXXX or visit our Web site: WWW.Starbarproducts.com

EPA Reg. No. 89459-XXX

EPA Est. No.

Wellmark International, 1501 East Woodfield Road, 200W, Schaumburg, Illinois 60173

Starbar is a registered trademark of Wellmark International, Central Garden & Pet and its logo are trademarks of Central Garden & Pet Company. Trap 'N Toss is a trademark of Farnam Companies, Inc. Trademarks are the property of their respective owners.

Made in USA

[Label for Reusable Jug Traps (2 sizes) - FRONT PANEL]

Includes Fly Attractant [for Half-Gallon/Gallon-Sized Traps]
[Brand Name][Captivator][Fly Terminator][Milk Jugg Trap]
[Attracts flies to fly traps][Atrayente de moscas]
[Insecticide free] [Libre de insecticida]
[Attracts filth breeding flies such as house flies, [blow flies,] [flesh flies,] [blue and green bottle flies,] [dump flies,] [and dung flies]]
[Pouches dissolve and activate in water]
[Easy to use][Just add water]
[For outdoor use]
[Reusable]
[Non-toxic]
[Includes proven fly attractant]
[Just add water]

ACTIVE INGREDIENTS:

Z-9 tricosene	1.0%
Putrescent whole egg solids	20.5%
Trimethylamine hydrochloride	1.0%
Indole	0.2%

OTHER INGREDIENTS:	<u>77.3%</u>
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TOTAL	100.0%
--------------	---------------

KEEP OUT OF REACH OF CHILDREN
CAUTION

ATTRACTANT NET CONTENTS: 1 oz (30 grams) (1 water soluble pouch) for ½ gallon trap
2 oz (60 grams) (2 water soluble pouches) for gallon trap

[Label for Reusable Jug Traps (2 sizes) - SIDE PANEL(S)]

Includes Fly Attractant for use in [Brand Name] [Half-Gallon-Sized Traps][Gallon-Sized Traps]

(Gallon-sized traps) - Specially formulated for use with [Brand Names] [Fly Terminator®, Fly Terminator®Pro, Milk Jugg™ Trap] [and other gallon-size reusable fly traps.]

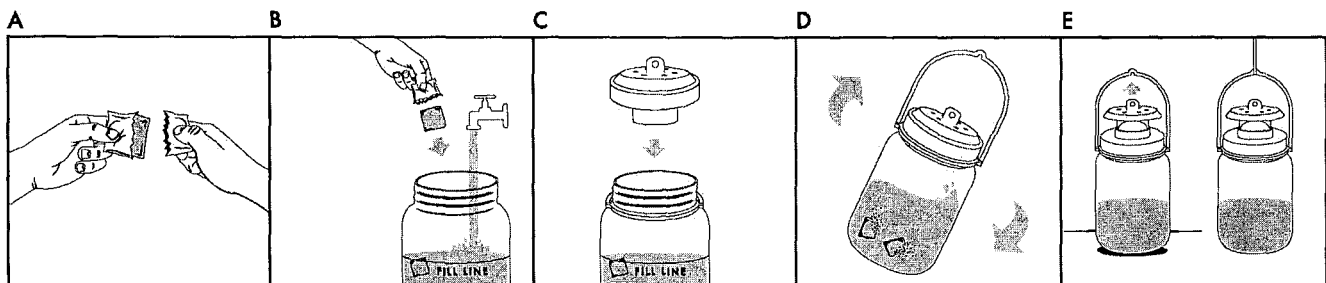
(Half-Gallon-sized traps) - Specially formulated for use with [Brand name] Starbar® Captivator® Fly Trap [and other half-gallon-size reusable fly traps.]

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

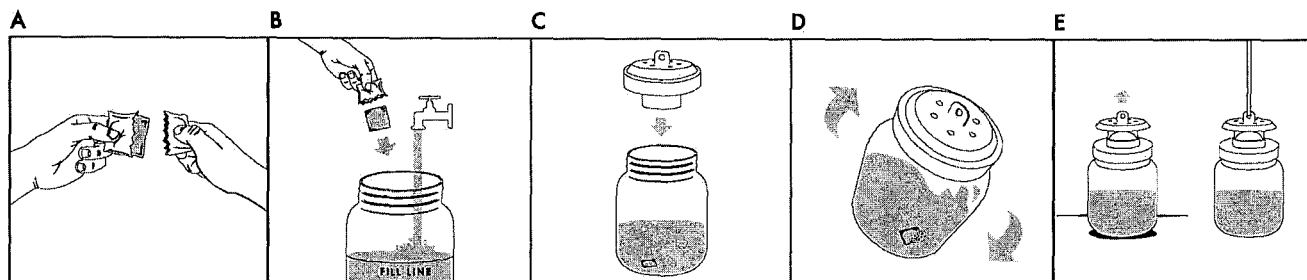
1. Bait and use trap outdoors.
2. Tear open packet containing fly attractant. [(Diagram A)]
3. Place [both] water-soluble attractant pouch(es) into trap. Do not open the inside pouch(es), it [they] will dissolve in water. (Gallon-sized traps) - Add one-half gallon of clean water[to fill line] to activate the attractant. (Half-Gallon-sized traps) Add one quart of clean water [to fill line] to activate the attractant. [(Diagram B)]
4. Securely replace top of trap. [Be sure center battle assembly is snapped into the open position.] [(Diagram C)]
5. Agitate lightly to disperse attractant. [(Diagram D)]
6. Hang trap outside from handle or tab on top of jug or place trap on ground in a sunlit area of high fly concentration when flies are active and where odors will not be a problem. [(Diagram E)] For best results, place trap within four feet of the ground. In hot weather (above 90°F/32°C), place trap in shade for better results, in cooler weather, place trap in sun.
7. Agitate trap contents occasionally to thoroughly wet trapped flies. Add water to the trap as necessary to maintain the fluid level. Rebait trap when full of flies, or when trap contents dry out.
8. Wash hands with soap and water after handling.
9. Trap may be rinsed and refill with replacement [Brand Name][fly attractant][WSP].

Graphics for Gallon Jug Traps



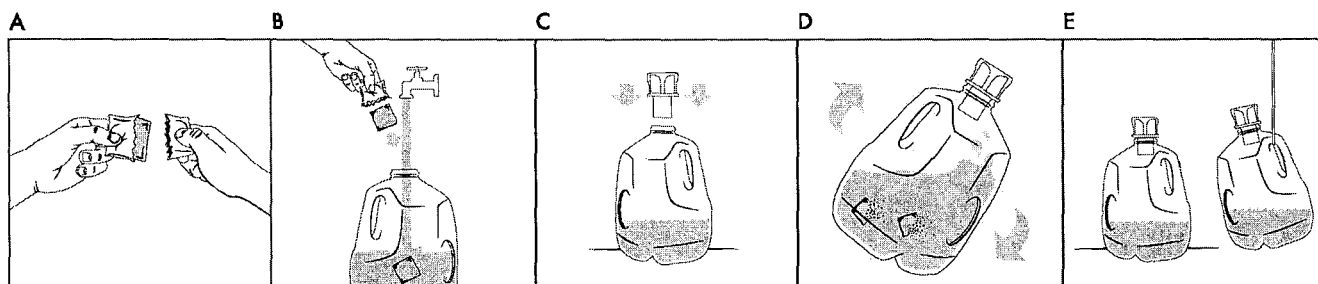
[Label for Reusable Jug Traps (2 sizes) - SIDE PANEL(S)]

Graphics for Half Gallon Jug Traps



(Alternate Directions For Use for Blister Card trap)

1. Bait and use trap outdoors.\
 2. Remove trapping heads and [fly attractant] packets from blister card.
 3. Rinse out a standard one-gallon plastic milk/water/juice jug of the type shown on the front of the blister card. Use only transparent type jugs, not opaque or colored jugs.
 4. Tear open packet containing fly attractant. [(Diagram A)]
 5. Place [both] water-soluble attractant pouch(es) into empty jug trap. Do not open the inside pouch(es), it/they will dissolve in water. Add one-half gallon of clean water to activate the attractant. [(Diagram B)]
 6. Slide cylinder part of trap head into mouth of jug. [(Diagram C)]
 7. Agitate lightly to disperse attractant. [(Diagram D)]
 8. Hang trap outside from handle or place trap on ground in a sunlit area of high fly concentration when flies are active and where odors will not be a problem. [(Diagram E)] For best results, place trap within four feet of the ground. In hot weather (above 90°F/32°C), place trap in shade for better results, in cooler weather, place trap in sun.
 9. Agitate trap contents occasionally to thoroughly wet trapped flies. Add water to the trap as necessary to maintain the fluid level. Re bait trap when full of flies, or when trap contents dry out.
 10. Wash hands with soap and water after handling.
 11. Trap may be rinsed and refill with replacement [Brand Name][fly attractant][WSP].
- NOTE:** not for indoor use, nor for use against biting flies. Contents may give off bad odor; keep contents from coming in contact with hands or clothing.



STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry, well-ventilated location out of reach of pets and livestock. **DISPOSAL:** Deposit outer packet in trash.

For information or in case of emergency, call 1-800-xxx-xxxx or visit our Web site: WWW.Starbarproducts.com

EPA Reg. No. 89459-XX

EPA Est. No.

Central Garden & Pet Company
1501 East Woodfield Road, 200W
Schaumburg, Illinois 60173

Starbar is a registered trademark of Welmark International, Central Garden & Pet is a registered trademark of Central Garden & Pet Company. Milk Jug is a trademark, and Fly Terminator is a registered trademark of Farnam Companies, Inc. Trademarks are the property of their respective owners.

Made in USA

[Label text for Fly Attractant WSP Refills - FRONT PANEL]

Fly [Trap] Attractant [Refills]

[Water soluble attractant pouches for use in [Brand Name] half-gallon and gallon-sized reusable fly traps]]

[Attracts flies to fly traps] [Atrayente de moscas]

[Insecticide free] [Libre de insecticida]

[Attracts filth breeding flies such as house flies, [blow flies,] [flesh flies,] [blue and green bottle flies,] [dump flies,] [and dung flies]]

[Fly Terminator]

[Pouches dissolve and activate in water]

[Easy to use]

Non-toxic

For use in the [Brand Name] reusable fly trap

Dissolves and activates in water

No killing agents, insects drown

ACTIVE INGREDIENTS:

Z-9 tricosene 1.0%

Putrescent whole egg solids 20.5%

Trimethylamine hydrochloride 1.0%

Indole 0.2%

OTHER INGREDIENTS:..... 77.3%

TOTAL 100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

ATTRACTANT NET CONTENTS: [2-24] oz
[60-720 grams]
[[2-24] one-oz (30 g) water soluble pouches]

[Label text for Fly Attractant WSP Refills – BACK PANEL]

[Brand Name] is specially formulated for use with [Brand Name] Fly Traps [including Fly Terminator®, Fly Terminator® Pro, Milk Jugg™ Trap, and Captivator® Fly Trap] [and other half-gallon and gallon-sized reusable fly traps.]

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

(DFU for Single/Double WSP Refill Packet(s))

1. Bait and use traps outdoors.
2. Tear open packet(s) [at tabs] and drop inner packet(s) into trap. Handle with dry hands or use gloves.
3. Do not open the inside pouch(es), it [they] will dissolve in the trap water.
4. Add water [to fill line].
5. Replace top securely.
6. Hang or place trap outside near a fly source.
7. Wash hands with soap and water after handling.
8. Empty trap and rebait attractant when trap dries out or becomes full, or after 30 days, whichever comes first.

(Alternate DFU for Resealable Bag of WSPs)

1. Bait and use traps outdoors.
2. Open zipper bag to remove water-soluble attractant pouch and drop pouch into trap. Handle with dry hands or use gloves.
3. Use attractants promptly after removing from package, and keep them dry during handling.
4. Do not open the inside pouches, they will dissolve in the trap water.
5. Reseal zipper bag after removing water-soluble attractant pouch(es), and keep sealed when not in use.
6. Add water [to fill line].
7. Replace top securely.
8. Hang or place trap outside near a fly source.
9. Wash hands with soap and water after handling.
10. Empty trap and replace attractant when trap dries out or becomes full, or after 30 days, whichever comes first.

USAGE RATES:

For [Brand Names] [and other gallon-sized reusable fly traps], place two water-soluble attractant pouches into trap and add one-half gallon of clean water to activate attractant.

For [Brand Names] [and other half-gallon reusable fly traps], place one water-soluble attractant pouch into trap and add one-quart of clean water to activate attractant.

NOTE: Not for indoor use, nor for use against biting flies. Contents may give off bad odor; do not allow contents to contact hands or clothing.

[Label text for Fly Attractant WSP Refills – BACK PANEL-continued]

STORAGE AND DISPOSAL

STORAGE: Store in original container in a cool, dry, well-ventilated location out of reach of children, pets and livestock. **PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this bag. **If empty:** Place in trash or offer for recycling, if available. **(Use if resealable bag) If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

For information or in case of emergency, call 1-800-xxx-xxxx or visit our Web site: [URL]

EPA Reg. No. 89459-XX

EPA Est. No.

Central Garden & Pet Company, 1501 East Woodfield Road, 200W, Schaumburg, Illinois 60173

Starbar is a registered trademark of Welmark International, Central Garden & Pet is a trademark of Central Garden & Pet Company. Milk Jugg is a trademark, and Captivator and Fly Terminator are registered trademarks of Farnam Companies, Inc. Trademarks are the property of their respective owners.

Made in USA

[Label text for WS POUCH LABEL]

Product Name

ACTIVE INGREDIENTS:

Z-9 tricosene 1.0%, Putrescent whole egg solids 20.5%, Trimethylamine hydrochloride 1.0%, Indole 0.2%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See outside label for Directions for Use.

EPA Reg No. 89459-XX

Net Contents



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

IAN WEATHERSTON, Ph.D.
J&T ASSOCIATES LLC
AGENT FOR CENTRAL GARDEN & PET COMPANY
4061 N. 156TH DRIVE
GOODYEAR, AZ 85395

RE: Application for Registration dated: 14-JAN-14
Date Fee Payment: 05-MAY-14
Product Name: RF2182 DRY FLY ATTRACTANT
EPA Registration Number: 894589-RR
Decision Number: D-491257

Dear Registrant:

The Agency has completed its initial contents screen of your application pursuant to Section 33(f)(4)(B) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended the Pesticide Registration Improvement Renewal Act. The Agency has determined that your application did not pass the initial contents screen and therefore must be rejected.

Specifically, the following items were missing or improperly formatted: FIFRA 10(d)(1) only provides for confidentiality of information which: (A) discloses manufacturing or quality control practices, (B) discloses the details of any methods for testing, detecting, or measuring the quantity of any deliberately added inert ingredient of a pesticide, or (C) discloses the identity or percentage quantity of any deliberately added inert ingredient of a pesticide... Since your claim covers information entirely outside this narrow range of subject matter, it cannot be accepted.

Furthermore, pursuant to FIFRA Section 33(b)(2)(G) the Agency must retain 25% of the registration service fee. Any future submissions to the Agency will be considered a new application and subject to the full registration service fee and another initial contents screen of all necessary fees, forms, data, and draft labeling.

Sincerely,

XXXXXXXXX, Director
Office of Pesticide Programs

J&T Associates LLC

49375300

Iain Weatherston Ph.D.
Director
623-217-9013 / 623-535-4055
E-mail: iweatherston@cox.net

January 17, 2014

Ms. Linda Hollis,
Chief, Biochemical Pesticides Branch
U.S. EPA – OCSPP – OPP – BPPD – PM #91 (7504P)
One Potomac Yard,
2777 South Crystal Drive
Arlington VA 22202-4501

SUBJECT: Application to register RF2182 DRY FLY ATTRACTANT

COMPANY: Central Garden & Pet Company, 1501 East Woodfield Road,
Suite 200, Schaumburg, IL 60173.

CONTACT: Iain Weatherston, Ph.D., J&T Associates LLC, 4061 N. 156th
Drive, Goodyear, AZ 85395.

PRIA Category B676

PRODUCT: RF2182 DRY FLY ATTRACTANT

Dear Ms. Hollis:

As consult to, and on behalf of Central Garden & Pet Company, I submit for your review and approval this application to register RF2182 DRY FLY ATTRACTANT. This biochemical attractant end-use product will be used in conjunction with various traps to control house flies and other filth flies in and around stables, commercial dairies, feedlots and other farm areas.

RF2182 DRY FLY ATTRACTANT is formulated [REDACTED] Z-9-tricosene with indole, trimethylamine (from the hydrochloride) and putrescent whole egg solids being the other active ingredients used to attract the target pests into a trap. RF2182 DRY FLY ATTRACTANT is a granular solid product which is packaged in water soluble pouches.

In addition to this letter the Administrative Volume 89459-?-1 contains:

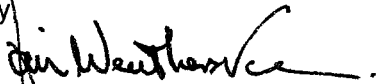
- A fully executed pesticide application form 8570-1
- A PRIA fee payment confirmation from pay.gov
- A copy of the letter of Agency
- A fully executed Formulator's Exemption Statement 8570-27
- A fully executed certification with respect to data citation form 8570-34
- Data matrices for indole, trimethylamine (from trimethylamine hydrochloride) and putrescent whole egg solids and RF2182 DRY FLY ATTRACTANT
- Draft master label (one copy bound into this volume and a copy on CD-ROM)
- Confidential Statement of Formula 8570-4 and accompanying notes.

In addition to the Administrative volume, the submission consists of the following volumes:-

VOLUME 89459-?-2	Product Chemistry of Indole, Trimethylamine, and Putrescent Whole Egg Solids, the Active Ingredients of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-3	Product Chemistry of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-3S	Product Chemistry of RF2182 DRY FLY ATTRACTANT
	Density of RF2182 DRY FLY ATTRACTANT.
VOLUME 89459-?-3S-1	Product Chemistry of RF2182 DRY FLY ATTRACTANT
	Enforcement Analytical Method.
VOLUME 89459-?-4	Toxicology, Non-Target Organisms and Environmental Fate of Indole, Trimethylamine and Putrescent Egg Solids, Active Ingredients of RF2182 DRY FLY ATTRACTANT.
	Request for Waivers of Specific Data Requirements
VOLUME 89459-?-5	Toxicology of RF2182 DRY FLY ATTRACTANT.
	Request for Waivers of Specific Data Requirements
VOLUME 89459-?-6	Product Performance: Field Efficacy of RF2182 in Fly Relief Traps.
VOLUME 89459-?-7	Product Performance: Field Efficacy of RF2182 in Trap 'N' Toss Traps.
VOLUME 89459-?-8	Product Performance: Field Efficacy of RF2182 in Captivator Traps.
VOLUME 89459-?-9	Product Performance: Field Efficacy of RF2182 in Terminator Pro Traps.

If there are any questions or you require further information please do not hesitate to contact me at iweatherston@cox.net or by phone at 623-535-4055.

Sincerely,



Iain Weatherston
Agent to Central Garden and Pet Company.

TRANSMITTAL DOCUMENT

NAME & ADDRESS OF APPLICANT

Central Garden and Pet Company
1501 East Woodfield Road, Suite 200.
Schaumburg, IL 60173

REGULATORY ACTION IN SUPPORT OF WHICH THIS PACKAGE IS SUBMITTED APPLICATION TO REGISTER RF2182 DRY FLY ATTRACTANT

TRANSMITTAL DATE

~~January~~ MAY 2, 2014.

LIST OF SUBMITTED MATERIAL

VOLUME 89459-?-1	Administrative Materials: Correspondence, Application, Forms, Label and Confidential Statement of Formula.
49375301 VOLUME 89459-?-2	Product Chemistry of Indole, Trimethylamine, and Putrescent Whole Egg Solids, the Active Ingredients of RF2182 DRY FLY ATTRACTANT.
49375302 VOLUME 89459-?-3	Product Chemistry of RF2182 DRY FLY ATTRACTANT.
49375303 VOLUME 89459-?-3S	Product Chemistry of RF2182 DRY FLY ATTRACTANT Density of RF2182 DRY FLY ATTRACTANT.
49375304 VOLUME 89459-?-3S-1	Product Chemistry of RF2182 DRY FLY ATTRACTANT Enforcement Analytical Method.
49375305 VOLUME 89459-?-4	Toxicology, Non-Target Organisms and Environmental Fate of Indole, Trimethylamine and Putrescent Egg Solids, Active Ingredients of RF2182 DRY FLY ATTRACTANT.
49375306 VOLUME 89459-?-5	Request for Waivers of Specific Data Requirements Toxicology of RF2182 DRY FLY ATTRACTANT.
49375307 VOLUME 89459-?-6	Request for Waivers of Specific Data Requirements Product Performance: Field Efficacy of RF2182 in Fly Relief Traps.
49375308 VOLUME 89459-?-7	Product Performance: Field Efficacy of RF2182 in Trap 'N' Toss Traps.
49375309 VOLUME 89459-?-8	Product Performance: Field Efficacy of RF2182 in Captivator Traps.
49375310 VOLUME 89459-?-9	Product Performance: Field Efficacy of RF2182 in Terminator Pro Traps.

PRIA INFORMATION

PRIA Category:	B676
Pay.gov Tracking ID:	25DJ34B8
Agency Tracking ID:	74544419177

COMPANY AGENT/CONTACT

Iain Weatherston, Ph.D.
J&T Associates LLC.
4061 North 156th Drive,
Goodyear, AZ 85395
(623) 535-4055 /iweatherston@cox.net

AGENT SIGNATURE: _____

DATE: 05/02/2014

J&T Associates LLC

4061 North 156th Drive, Goodyear, AZ 85395

Dr. Iain Weatherston

623-535-4055/623-317-9013

E-mail: iweatherston@cox.net

May 19, 2013.

Ms. Linda Hollis
Chief, Biochemicals Branch
U.S. EPA – OCSP – OPP – BPPD
One Potomac Yard
2777 South Crystal Drive,
Arlington, VA 22202

SUBJECT: Response to phone call and letter indicating a change in PRIA coding for the application to register RF2182 Dry Fly Attractant.

COMPANY: Central Garden and Pet Company, 1501 East Woodfield Road, Suite 200, Schaumburg, IL 60173.

CONTACT: Iain Weatherston, Ph.D., J&T Associates LLC, 4061 North 156th Drive, Goodyear, AZ 85395.

PRODUCT: RF2182 Dry Fly Attractant [File Symbol 89459-RR]

Dear Ms. Hollis:

I wish to discuss with you aspects of the application to register the subject product. It was submitted as PRIA category B676 but last week I had a call from Andy Bryceland informing me that this category would be changed to B600 since one of the active ingredients in the product trimethylamine hydrochloride is a new active ingredient which will result in a significant increase in the PRA fee. Today I received confirmation of this in an e-mail from Mick Yanchulis and the letter from Front End Screen which was attached to his e-mail. I also left a voice mail with Nicole Berckes since I am concerned that EPA will reject the action if the new fee is not paid within 14 days.

Central Garden and Pet Company fully intend to pursue the registration of RF2182 Dry Fly Attractant but we need to resolve some issues with trimethylamine/trimethylamine hydrochloride. We would like to resolve these issues by correspondence but will ask for a face-to-face meeting should this fail.

In the fly attractant mixtures one of the attractants is trimethylamine which as you know is a gas with a boiling point of 3° - 7° so it is inconceivable how any company can manufacture or formulate a solid or granular product containing such a gas. In the RF2128 product the product is formulated using trimethylamine hydrochloride and then under the conditions of use when the attractant mixture is added to water in a trap the salt hydrolyses slowly releasing trimethylamine gas – a component, attractive to flies. In my reading of the regulations, the CSF is a listing of the actual materials used to produce the product which is packaged and sold, and this was done since the hydrochloride salt of trimethylamine is the material that ends up in the water soluble sachets which are sold to the public. The use of salts to generate trimethylamine is not new and is detailed in several places including a patent which issued in October 1997, assigned to Sandoz [USP# 5,679,363]. In the patent it is stated “of all the trialkylamines known to serve as fly attractants, trimethylamine is preferred, but due to its gaseous nature, an inorganic salt of

trimethylamine is used Upon contact with water, the trimethylamine salt readily dissociates and releases trimethylamine, which in turn stimulates a favorable olfactory response in flies."

The European authorities have like the Agency been confused with the amine/amine salt situation in various fly attractants including the Mediterranean Fruit Fly. In the Conclusion of the Peer Review of the Pesticide Risk Assessment of the Active Substance Trimethylamine Hydrochloride, the European Food Safety Authority (EFSA) published on January 11, 2012 the reviewers stated "it should be noted that trimethylamine hydrochloride can be considered a variant of trimethylamine."

In the CSF which was submitted as part of the application (see page 1 of 2) there is a double asterisk (**) in Box 13b on the line for Trimethylamine hydrochloride. The double asterisk is explained on the following page (Page 4 of 34) as "1% TMA.HCL will generate 0.60% trimethylamine gas which is the actual attractant." Trimethylamine hydrochloride is the material used in the formulation and this is clearly stated in the Volume 89459-?-3 describing OCSPP 880.1200.

Central Garden and Pet Company believe the issue can be resolved and the PRIA category of B676 maintained, if an amended label is submitted with the following ingredient statement. The remainder of the application including CSF and OCSPP 880.1200.

ACTIVE INGREDIENTS

Z-9-Tricosene	1.0%
Putrescent whole egg solids	20.5%
Trimethylamine	0.6%*
Indole	0.2%
OTHER INGREDIENTS	77.7%

* Trimethylamine generated from 1% trimethylamine hydrochloride.

If you have any questions or require further information please contact me by phone or e-mail. As I said above we would like to have this issue resolved before the Agency imposed 14 day deadline expires.

Sincerely,



Iain Weatherston
Authorized Agent To Central Garden and Pet Company.

Payment Still Due

Please complete the 21-day review and forward to the appropriate regulatory division.

Regulatory divisions, please check with Mick Yanchulis (347-0237) to ensure full payment has been made before beginning any substantive work on this action.

Iain Weatherston

From: paygovadmin@mail.doc.twai.gov
Sent: Tuesday, December 17, 2013 12:43 PM
To: iweatherston@cox.net
Subject: Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or wish to cancel this payment, please contact Pay.gov Customer Service by phone at (800) 624-1373 or by email at pay.gov.clev@clev.frb.org.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 25DJ34B8
Agency Tracking ID: 74544419177

Account Holder Name: J&T Associates LLC

Transaction Type: ACH Debit

Transaction Amount: \$8,683.00

Payment Date: Dec 18, 2013

Commercial/financial information may be entitled to confidential treatment

Account Type: Business Checking

Routing Number: [REDACTED]

Account Number: *****[REDACTED]

Transaction Date: Dec 17, 2013 2:42:56 PM Total Payments Scheduled: 1

Frequency: OneTime

Decision Number:

Registration Number: 89459-?

Company Name: Central Pet Garden Co.

Company Number: 89459

Action Code: B676

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Steven R. Spaulding
Senior Director, Regulatory Affairs
Central Garden & Pet Company
1501 E. Woodfield Rd
Suite 200W
Schaumburg, IL 60173

847-330-5380 phone
847-330-5391 fax

sspaulding@central.com

October 11, 2013

Ms. Kathleen O'Malley
U.S. EPA – OPP – ITRMD
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001

SUBJECT: Notification of Authorized Agent [40CFR 152.122(b)]

COMPANY: Central Garden & Pet Company
1501 East Woodfield Road, Suite 200, Schaumburg, IL 60173

Dear Ms. O'Malley:

By this letter, I wish to notify the Agency, as required by 40 CFR 152.122(b), that Dr. Iain Weatherston of J&T Associates LLC., 4061 North 156th Drive, Goodyear, AZ 85395 is the authorized agent of Central Garden & Pet Company.

Dr. Weatherston is authorized to act on behalf of Central Garden & Pet Company in all matters before the U.S. EPA pertaining to the registration and regulations of fly attractant mixtures. All correspondence and other communications should be addressed to Dr. Weatherston with copies to Mr. Steven R. Spaulding.

Contact information for Dr. Weatherston and Mr. Spaulding is respectively:

Dr. Iain Weatherston, J&T Associates LLC, 4061 N. 156th Drive, Goodyear, AZ 85395
(623-535-4055) iweatherston@cox.net

Mr. Steven R. Spaulding, Senior Director of Regulatory Affairs, Central Garden & Pet Company,
1501 East Woodfield Road, Suite 200W, Schaumburg, IL 60173
(847-330-5380) sspaulding@central.com

I thank you for your assistance in this matter. Should there be any questions or if further information is required, do not hesitate to contact me.

Sincerely,

Steven R. Spaulding
Senior Director of Regulatory Affairs

cc: Linda Hollis
Iain Weatherston

CONFIDENTIALITY CLAIMS

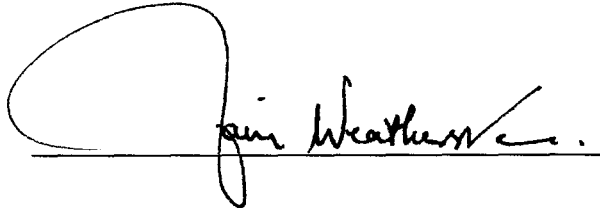
STATEMENT OF DATA CONFIDENTIALITY

Information claimed confidential on the basis of its falling within the scope of FIFRA § 10(d)(1)(A),(B) or (C) has been removed to a confidential attachment and is cited by cross-reference number in the body of the text.

COMPANY: Central Garden and Pet Company
1501 East Woodfield Road, Suite 200
Schaumburg, IL 60173.

AGENT: Iain Weatherston, Ph.D.

SIGNATURE:

A handwritten signature in black ink, appearing to read "Iain Weatherston", written over a horizontal line.

1/14/2014
Date

TITLE: Consultant/Authorized Agent to Central Garden and Pet Company

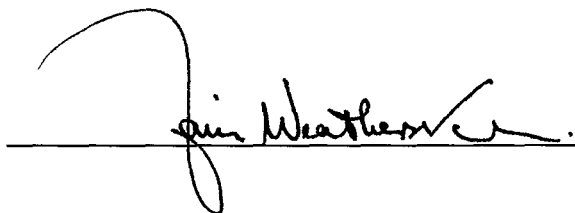
VOLUNTARY RELEASE OF INFORMATION TO STATES AND FOREIGN GOVERNMENTS
[40 CFR158.33 (c) (4)]

I authorize the U.S. Environmental Protection Agency to release any information contained in this document to State and Foreign Governments without relinquishing proprietary rights or any confidentiality claims asserted on the previous page.

COMPANY: Central Garden and Pet Company
1501 East Woodfield Road, Suite 200
Schaumburg, IL 60173.

AGENT: Iain Weatherston, Ph.D.

SIGNATURE:

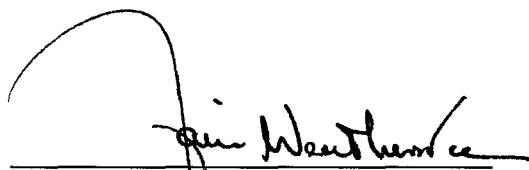
A handwritten signature in black ink, appearing to read "Iain Weatherston", is written over a horizontal line.

1/14/2014
Date

TITLE: Consultant/Authorized Agent to Central Garden and Pet Company

GOOD LABORATORY PRACTICES STATEMENT

The purpose and scope of this report **DO NOT** fall under the requirements of 40 CFR 160.



Iain Weatherston
For Applicant and Submitter

1/14/2014
Date

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